

EXHIBIT 3

Transcript of the Testimony of **Jennifer Virden**

September 21, 2022

Jennifer Virden v. City of Austin

Givens Court Reporting
sgivens@austin.rr.com
(512) 301-7088

<p>IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS AUSTIN DIVISION</p> <p>JENNIFER VIRDEN, § § Plaintiff, § CIVIL ACTION NO. v. § 1:21-CV-271-RP THE CITY OF AUSTIN, § § Defendant. §</p> <p>* * * * *</p> <p>THE ORAL DEPOSITION OF JENNIFER VIRDEN SEPTEMBER 21, 2022</p> <p>* * * * *</p> <p>ORAL DEPOSITION OF JENNIFER VIRDEN, produced as a witness at the instance of the Defendant and duly sworn, was taken in the above styled and numbered cause on the 21st day of September 2022, from 12:15 p.m. to 3:27 p.m., before Sandra S. Givens, CSR, in and for the State of Texas, reported by machine shorthand method, at Austin City Hall, 301 W. 2nd Street, 4th floor, Austin, Texas 78701, pursuant to the Federal Rules of Civil Procedure.</p>	<p>I N D E X</p> <p>1 2 3 Appearances - - - - - 2 4 Exhibits - - - - - 3 5 JENNIFER VIRDEN 6 Examination by Mr. Hicks - - - - - 4 Examination by Mr. Najvar - - - - - 117 7 Further Examination by Mr. Hicks - - - - - 130 8 Changes and Signature - - - - - 133 9 Reporter's Certification - - - - - 134</p> <p>10 11</p> <p>E X H I B I T S</p> <p>12 13 NO. DESCRIPTION PAGE 14 Exhibit 1 - - - - - 8 6/17/21 Deposition Transcript of Jennifer Virden</p> <p>15 16 Exhibit 2 - - - - - 9 Virden's Responses to City's First Request for Admissions</p> <p>17 18 Exhibit 3 - - - - - 14 4/1/22 Memorandum from City Clerk to Candidates for 2022 City Council Election, Re: Annual Adjustment of Campaign Finance Limits</p> <p>19 20 Exhibit 4 - - - - - 16 "Revised Order of Place on the Ballot for General Election to be Held on November 8, 2022"</p> <p>21 22 Exhibit 5 - - - - - 17 "Application for a Place on the City of Austin Nov. 3, 2020 General Election Ballot" for Austin City Council, District 10</p> <p>23 24 Exhibit 6 - - - - - 17 25 "Appointment of a Campaign Treasurer by a</p>
Page 1	Page 3
<p>A P P E A R A N C E S</p> <p>1 FOR THE PLAINTIFF: 2 Mr. Jerad Najvar 3 NAVJAR LAW FIRM, PLLC 4 2180 North Loop West, Suite 255 5 Houston, Texas 77018 6 (281) 404-4696 7 jerad@najvarlaw.com</p> <p>8 FOR THE DEFENDANT: 9 Mr. Renea Hicks 10 LAW OFFICE OF MAX RENEA HICKS 11 P.O. Box 303187 12 Austin, Texas 78731 13 (512) 480-8231 14 rhicks@renea-hicks.com</p> <p>15 Ms. Laura Norton 16 Contract Legal Assistant 17 (512) 917-6115 18 lnorton@austin.rr.com</p>	<p>1 Exhibit 7 - - - - - 20 2 Plaintiff's Second Amended Complaint 3 Exhibit 8 - - - - - 22 Ordinance No. 20171005-029 (Puts into Law the One-Year Fundraising Limit) 4 Exhibit 9 - - - - - 23 Austin City Charter Section 8 - "Limits on Campaign Contributions and Expenditures" 5 Exhibit 10 - - - - - 27 5/6/21 Email from Jennifer Virden to City Clerk 6 Attaching "Amendment: Appointment of a Campaign Treasurer by a Candidate." 7 Exhibit 11 - - - - - 28 6/23/21 Amendment to "Amendment: Appointment of a Campaign Treasurer by a Candidate" 8 Exhibit 12 - - - - - 28 "Application for a Place on the Ballot for a General Election for a City, School District or Other Political Subdivision" 9 Exhibit 13 - - - - - 31 Plaintiff's Initial Disclosures 10 Exhibit 14 - - - - - 33 11 Virden's Responses to Defendant's First Set of Interrogatories 12 Exhibit 15 - - - - - 33 13 Virden's First Supplemental Responses to Defendant's First Set of Interrogatories 14 Exhibit 16 - - - - - 40 15 Virden's Responses to Defendant's Second Set of Interrogatories 16 Exhibit 17 - - - - - 40 17 First Supplemental Verification of Jennifer 18 Virden 19 Exhibit 18 - - - - - 45 20 Second Supplemental Verification of Jennifer 21 Virden</p>
Page 2	Page 4

1 (Pages 1 to 4)

1 Exhibit 19 - - - - - Plaintiff's Opposed Motion for Temporary 2 Restraining Order	45	1 A Oh, sorry. I will wait till you finish. 2 Yes.
3 Exhibit 20 - - - - - Verifications/Declarations of Support from 4 Austin Residents	57	3 Q Okay.
5 Exhibit 21 - - - - - Tweet Exchange Between @HendrixK1224 and 6 @CariMarshallTX re: @Jennifer4Austin	62	4 MR. HICKS: So just so it's clear 5 on the record, we -- as I said, I'm more organized than 6 usual. So we've actually tabbed for ourselves the 7 exhibits I think we're probably going to use. So if 8 you hear me say tab something to Laura, that's so she 9 can find it. But the tab number may be different -- 10 will be different usually than the actual exhibit 11 number in the deposition. So the one we need to pay 12 attention to is the exhibit number that's attached to 13 it by the court reporter. Okay?
7 Exhibit 22 - - - - - Plaintiff's First Amended Complaint	64	14 MR. NAJVAR: Okay. And so just for 15 the record, can you -- you can refer to the tab as you 16 have it, but can you also when you're offering it or 17 talking about it refer to the exhibit?
8 Exhibit 23 - - - - - "Correction/Amendment Affidavit for Candidate/ 9 Officeholder" filed 10/27/20	70	18 MR. HICKS: Oh, yeah. No. That's 19 what I'm going to do. I'm just calling the tab up so 20 Laura can pull it out and give y'all copies of it.
10 Exhibit 24 - - - - - "Correction/Amendment Affidavit for Candidate/ 11 Officeholder" filed 6/18/21	71	21 MR. NAJVAR: Okay.
12 Exhibit 25 - - - - - "Candidate/Officeholder Campaign Finance 13 Report" Filed 1/15/21	75	22 MR. HICKS: That's the only reason 23 I'm doing it.
14 Exhibit 26 - - - - - (Withdrawn)	82	24 MR. NAJVAR: But then you'll mark 25 it as exhibit whatever?
15 Exhibit 27 - - - - - "Correction/Amendment Affidavit for Candidate/ 16 Officeholder" filed 12/8/20	83	
17 Exhibit 28 - - - - - "Candidate/Officeholder Campaign Finance 18 Report" Filed 7/15/21	85	
19 Exhibit 29 - - - - - "Candidate/Officeholder Campaign Finance 20 Report" Filed 1/4/22	95	
21 Exhibit 30 - - - - - "Candidate/Officeholder Campaign Finance 22 Report" Filed 7/13/22	101	
23 Exhibit 31 - - - - - Screenshots from Jennifer Virden's Website	103	
25		

Page 5

Page 7

1 JENNIFER VIRDEN, 2 having been first duly sworn, testified as follows: 3 EXAMINATION 4 BY MR. HICKS: 5 Q Ms. Virden, just for the record, state your 6 name and where you live. 7 A Jennifer Marie Virden, 8307 High Oak Drive, 8 Austin, Texas 78759. 9 Q And you're here pursuant to an amended notice 10 of oral deposition. Have you seen that? 11 A Yes. 12 Q Okay. I'm Renea Hicks, an attorney for the 13 city in the case. Let's just hop in. 14 So what did you do in preparation for 15 today's deposition? 16 A Reread some filings, spoke with Jerad, my 17 attorney, and that's it. 18 Q Okay. Did you meet or discuss this 19 deposition in preparation for it with anyone else other 20 than Jerad? 21 A No. 22 Q Is one of the things you did in preparation 23 review the transcript of your prior deposition in -- 24 A Yes. 25 Q -- this case?	1 MR. HICKS: Oh, yeah. Oh, yeah. 2 No. That's the plan. Sorry. 3 Okay. Tab 15, will you mark that as 4 Deposition Exhibit 1? 5 (Exhibit No. 1 marked.) 6 Q Okay. Ms. Virden, would you take a look at 7 Deposition Exhibit 1? Does that appear to be the 8 transcript of your deposition in this case on whatever 9 date it was, June 17th of 2021? 10 A It appears to be so. Yes. 11 Q And in your review did you -- do you have any 12 changes after having reviewed it? 13 A None that I can think of at the moment. 14 Q Okay. All right. You're running for a 15 position in the Austin City Council; is this right? 16 A I'm running for mayor. 17 Q Okay. And how long have you considered 18 yourself to be a candidate for mayor? 19 A I believe since February or so of 2021. 20 Q And what outward indication, I guess you 21 could say, to -- not just internal deliberations for 22 yourself. What outward indications would anybody need 23 to look at to see that you had become a candidate for 24 mayor at that point? 25 A Probably Twitter and Facebook and Constant
---	---

Page 6

Page 8

2 (Pages 5 to 8)

<p>1 Contact. I believe I announced over Twitter.</p> <p>2 Q Okay. Some of these questions are going to</p> <p>3 be so obvious, but let's -- just to make sure they're</p> <p>4 on the record.</p> <p>5 So the mayor's race in Austin is a</p> <p>6 citywide race, right?</p> <p>7 A Yes.</p> <p>8 Q All timely registered voters in Austin are</p> <p>9 eligible to vote in that race, right?</p> <p>10 A Yes.</p> <p>11 MR. HICKS: Let's look at Tab 11.</p> <p>12 This will be Exhibit 2.</p> <p>13 (Exhibit No. 2 marked.)</p> <p>14 A This for me?</p> <p>15 Q This one. Yes. All right. Deposition</p> <p>16 Exhibit 2, and look if you will at response number 2.</p> <p>17 A Okay.</p> <p>18 Q It's the long narrative there. You might</p> <p>19 look at the question.</p> <p>20 A All right.</p> <p>21 Q "You have not been a candidate."</p> <p>22 A Okay.</p> <p>23 Q Okay. You see there -- I'm not going to ask</p> <p>24 you about the legal commentary there, but you see there</p> <p>25 where you say you've been a candidate for Austin city</p>	<p>1 been continuously campaigning since the runoff, but I</p> <p>2 think I, I think I announced my candidacy that I</p> <p>3 determined to be mayor in February, I think.</p> <p>4 Q Okay. While we're on this exhibit,</p> <p>5 Deposition Exhibit 2, would you look at your response</p> <p>6 to request number 1 where you say you've been at your</p> <p>7 8307 High Oak Drive residence continuously since</p> <p>8 October 2017? You see that?</p> <p>9 A Yes.</p> <p>10 Q That's still true, correct?</p> <p>11 A Yes.</p> <p>12 Q How long have you resided at that address?</p> <p>13 A I think, well, about 13 years.</p> <p>14 Q Okay. And did you reside in Austin before</p> <p>15 that?</p> <p>16 A Yes.</p> <p>17 Q Okay. How long?</p> <p>18 A Forever.</p> <p>19 Q Forever?</p> <p>20 A 55 years or -- I've been here 55 years.</p> <p>21 Q Okay. And when did you start to take what I</p> <p>22 would broadly characterize as an active interest in</p> <p>23 Austin politics?</p> <p>24 A Probably 2008.</p> <p>25 Q What, what was the occasion for that?</p>
Page 9	Page 11
<p>1 office continuously since December 15th --</p> <p>2 A Yes.</p> <p>3 Q -- 2020?</p> <p>4 A Yes.</p> <p>5 Q What were you a candidate for starting on</p> <p>6 December 15th, 2020?</p> <p>7 MR. NAJVAR: I'm going to object to</p> <p>8 the extent it calls for a legal conclusion. But</p> <p>9 Jennifer, you can, you can answer.</p> <p>10 A Well, I think, as we discussed --</p> <p>11 MR. NAJVAR: If you know.</p> <p>12 A Okay. Will you restate the question, please?</p> <p>13 Q (By Mr. Hicks) Sure. In that response</p> <p>14 number 2 on Exhibit 2 it says there that you -- just to</p> <p>15 make sure I quoted it, "Virden has been a candidate for</p> <p>16 Austin office, under Texas and Austin law, continuously</p> <p>17 since December 15, 2020."</p> <p>18 What is your understanding of what you</p> <p>19 were a candidate for at that time?</p> <p>20 A Well, I believe what we discussed previously</p> <p>21 in my other deposition was that at the time I knew I</p> <p>22 was going to be running for an office, either a</p> <p>23 District 10 city council -- or whatever my district</p> <p>24 number was going to be after remapping, but it's still</p> <p>25 in the same residence -- or mayor. And so yes, I have</p>	<p>1 A I just started being more politically</p> <p>2 engaged, paying more attention. But, and then it</p> <p>3 evolved from 2008 to 2012 to 2016. It just evolved.</p> <p>4 Q And is there any particular issue or event --</p> <p>5 A Well --</p> <p>6 Q -- that you recall in 2008 or 2012 or 2016?</p> <p>7 A Nothing in particular way back then, but I</p> <p>8 will say it was the lifting of the camping ban and</p> <p>9 defunding the police that -- in 2019 and 2020.</p> <p>10 Q Right. But I'm looking before that.</p> <p>11 A I couldn't tell you back then anything. I</p> <p>12 just --</p> <p>13 Q Okay.</p> <p>14 A -- became more interested.</p> <p>15 Q And what did you do in connection with being</p> <p>16 interested?</p> <p>17 A Just reading and following, but nothing --</p> <p>18 Q Local news?</p> <p>19 A Yes.</p> <p>20 Q Local coverage, TV and radio and newspaper I</p> <p>21 suppose?</p> <p>22 A Yes.</p> <p>23 Q Okay. Anything else that stands out for you</p> <p>24 in terms of actively following?</p> <p>25 A No.</p>

Page 10

Page 12

3 (Pages 9 to 12)

<p>1 MR. HICKS: Let's look at Tabs 2 2 and 28.</p> <p>3 (Exhibit No. 5 marked.)</p> <p>4 THE REPORTER: That's 5 and 6.</p> <p>5 Q (By Mr. Hicks) You have now in front of you 6 two deposition exhibits, 5 and 6.</p> <p>7 MR. NAJVAR: Renea, can we identify 8 which is which just for the record?</p> <p>9 MR. HICKS: Sure. I can't, because 10 I can't read upside down very well. Deposition Exhibit 11 5 is an application by Ms. Virden for a place on the 12 City of Austin ballot for November 3, 2020, and the 13 Exhibit 6 is her appointment of a campaign treasurer.</p> <p>14 Q Those two exhibits reflect that you entered 15 the race on August 17th -- to be able to raise funds on 16 August 17, 2020, correct?</p> <p>17 A Yes.</p> <p>18 Q Do you consider that rather late in the 19 process to have come in?</p> <p>20 A No.</p> <p>21 Q Why is that?</p> <p>22 A Because it was still in the filing window.</p> <p>23 Q And in terms of getting a campaign up and 24 going, though, do you consider it rather late?</p> <p>25 A For a first-time candidate just jumping in,</p>	<p>1 better to announce sooner, yes, to file and start 2 running sooner.</p> <p>3 Q So had your personal financial situation 4 changed in any way around that time?</p> <p>5 A Not significantly at that time. No.</p> <p>6 Q And what about between then and now?</p> <p>7 A Yes.</p> <p>8 Q In what way? And generally; I'm not looking 9 for great detail.</p> <p>10 A I don't know how to state that. It's, it's 11 not -- I don't --</p> <p>12 THE WITNESS: How am I supposed to 13 answer that?</p> <p>14 MR. NAJVAR: Well, let me just -- 15 like he said, he's not looking for specific details. I 16 think he's just asking a general question about your 17 financial situation. Maybe he can --</p> <p>18 MR. HICKS: I don't mind asking 19 more detail. I was trying not to go into as much 20 detail.</p> <p>21 Q So what I'm trying to get at is, were 22 you -- do you consider yourself more financially secure 23 now than you did back when you ran for the District 10 24 race?</p> <p>25 A More, yes, but I was financially secure back</p>
Page 17	Page 19
Page 18	Page 20

5 (Pages 17 to 20)

<p>1 Q And if you look at paragraph 3 on page 2 of 2 that exhibit, you'll see there -- page 2 of paragraph 3 3 -- yeah. In there you, you refer to that -- or your 4 attorney in drafting this refers to that by the 5 shorthand the "new blackout period."</p> <p>6 A Mm-hm.</p> <p>7 Q Do you see that?</p> <p>8 A Yes.</p> <p>9 Q Okay. And if you go back to page 18 -- I'm 10 sorry -- yeah, page 18, which is the last, the last or 11 next to the last page, and in paragraphs 1 through 3 of 12 the Prayer for Relief there's where you level the 13 challenge against, your claim against and ask for 14 relief as to the new, what you call the new blackout 15 period, right?</p> <p>16 A Let me read that, please.</p> <p>17 Q Uh-huh.</p> <p>18 A Yes.</p> <p>19 Q Okay. There's also a challenge to the city 20 charter provision leveled in here. I'm getting into 21 more details later, but I'm just trying to get a 22 general picture. There's also a challenge to the city 23 charter provision that has some rules about campaign 24 finance that you level only to the extent and if it 25 sets a one-year fundraising limit. Do you recall that?</p>	<p>1 that ordinance and subsection, the subsection of it 2 that adds (B) to 2-2-7 of the city code. Do you see 3 that?</p> <p>4 A Mm-hm.</p> <p>5 Q That's the provision you're saying is 6 unconstitutional, correct?</p> <p>7 A Yes.</p> <p>8 Q Just read it if you don't mind. It's in the 9 record.</p> <p>10 A "The campaign period for a general election 11 begins the 365th day before the date of the general 12 election."</p> <p>13 Q Okay.</p> <p>14 MR. HICKS: Now let's look at Tab 15 1A. (Exhibit No. 9 marked.)</p> <p>16 MR. NAJVAR: Is this Exhibit 8 now? THE WITNESS: This is 9.</p> <p>17 MR. HICKS: This is Exhibit 9. THE WITNESS: This one.</p> <p>18 MR. HICKS: Exhibit 8 is the city 19 ordinance of 2017.</p> <p>20 MR. NAJVAR: Okay.</p> <p>21 MR. HICKS: And Laura is keeping a 22 running tab if you want to check with her.</p>
---	---

Page 21

Page 23

<p>1 A Yes.</p> <p>2 Q That's the way I feel about it too. And in 3 that, in the shorthand version for that -- and we can 4 go into more detail about it, but the shorthand version 5 for that, and you can look at -- well, you don't need 6 to look -- is that it allows unsuccessful candidates 7 for city office to raise funds to pay off campaign 8 expenses and some unreimbursed expenditures, right?</p> <p>9 A Yes.</p> <p>10 Q Okay. Now let's look at the two sets of 11 rules.</p> <p>12 MR. HICKS: Let's look at Tab 1. (Exhibit No. 8 marked.)</p> <p>13 THE REPORTER: Exhibit 8.</p> <p>14 Q That's the city ordinance that put into law 15 the one-year fundraising limit you're challenging, 16 correct?</p> <p>17 A It appears to be. Yes.</p> <p>18 Q It was enacted on October 5th, 2017, to take 19 effect on October 16th, 2017, correct? Take a second 20 to look if you want.</p> <p>21 A It takes effect on October 16th, 2017.</p> <p>22 Q Enacted on October 5th, correct --</p> <p>23 A Yes.</p> <p>24 Q -- by the council? Okay. Look at Part 2 of</p>	<p>1 MR. NAJVAR: Okay.</p> <p>2 Q (By Mr. Hicks) Okay. You've got in front of 3 you Exhibit 9 now. That is -- I'll represent to you I 4 copied that and pasted it. So that is, that is the 5 city charter provision that you're provisionally, I'll 6 call it provisionally challenging. This uses the term 7 "unsuccessful candidate." Do you see that?</p> <p>8 A Yes.</p> <p>9 Q The first time you were an unsuccessful 10 candidate was after the December 2020 runoff election 11 for District 10, right?</p> <p>12 A Yes.</p> <p>13 Q Did you have unpaid expenses after that race?</p> <p>14 A Well, I had, I had loaned myself money, and I 15 paid myself back with remaining campaign funds. I 16 don't know if that's the same as unpaid expenses, but I 17 don't --</p> <p>18 Q Okay. Aside from that.</p> <p>19 A I, I paid any expenses from the, the leftover 20 campaign funds, so I don't know at what point were they 21 unpaid. They weren't unpaid after I paid them.</p> <p>22 Q Well, I mean were they unpaid -- here.</p> <p>23 After the runoff concluded and the 24 results were announced --</p> <p>25 A Mm-hm.</p>
--	---

Page 22

Page 24

6 (Pages 21 to 24)

<p>1 Q -- did you have any remaining unpaid expenses 2 from your campaign other than the loan issue which we 3 are -- 4 A Yes. Yes. 5 Q -- which we are -- 6 A Oh, sorry. 7 Q -- addressing? Go ahead. 8 A Yes. 9 Q Okay. 10 A I had to pay some bills after the runoff 11 election. 12 Q Okay. And do you recall what they were? 13 A They were -- 14 Q I don't mean specifically. 15 A Yeah. Just regular campaign expenses. I 16 can't think exactly what they were, but I remember 17 writing some checks. 18 Q Okay. 19 A Nothing that seemed out of the ordinary to 20 me. 21 Q Did you have unreimbursed campaign 22 expenditures from personal funds that were made with 23 the intent to seek reimbursement from political 24 contributions? 25 A I don't recall that after the runoff. I do</p>	<p>1 3, which would be Deposition Exhibit 10. 2 (Exhibit No. 10 marked.) 3 Q It's a cover email from you sending what? 4 A "Please confirm your receipt of the attached 5 form." That was the amendment to the Appointment of a 6 Campaign Treasurer by a Candidate. 7 Q Okay. And you sent it on May 6; it 8 technically shows up on the second page to being filed 9 on May 10th of 2021, right? 10 A Correct. 11 Q And the only thing that changed there with 12 regard to the campaign treasurer is your designation of 13 the office sought, correct? 14 A Correct. 15 Q And you changed it from Austin City Council 16 District 10 to what? 17 A "November 2022 Mayor or Council District." 18 Q Okay. Which council district were you 19 referring to, if you recall? 20 A At the time it would have been 10, because 21 that's where I lived, and it is still 10. But it could 22 have changed during remapping. 23 Q Okay. 24 A The council district number could have 25 changed.</p>
Page 25	Page 27

<p>1 recall in one of my C&Es that I did have some -- 2 THE REPORTER: In one of your what? 3 THE WITNESS: C&E, C and E. 4 THE REPORTER: Thank you. 5 A I don't remember which C&E report that was. 6 Q What is a C&E report? 7 A Contributions and expenditures. 8 Q Oh, okay. 9 A In one or more of my C&Es I did have 10 person- where I had to reimburse myself for expenses I 11 paid out of personal funds, but I don't remember how 12 many or which reports those were. 13 Q Okay. And after the results of the runoff 14 election were official -- I guess that would be after 15 the city canvass -- 16 A Mm-hm. 17 Q -- did you solicit and accept political 18 contributions to pay these expenses or unreimbursed 19 expenditures? 20 A No. 21 Q So looking back at Exhibit 8 -- actually it's 22 Part (B), the part you're challenging, 2-2-7(B) -- did 23 that have any effect on your 2020 council race? 24 A No. 25 MR. HICKS: Now let's look at Tab</p>	<p>1 MR. HICKS: Tab 4. 2 (Exhibit No. 11 marked.) 3 Q Now I'm going to hand you Deposition 4 Exhibit 11. It's another amendment, am I correct, to 5 the designation of campaign treasurer? 6 A Yes. 7 Q And there's again only one change that you're 8 making, correct? 9 A Yes. 10 Q And that is from "November 2022 Mayor or 11 Council District" to what? 12 A "Mayor of Austin." 13 Q Okay. 14 MR. HICKS: Tab 6. 15 (Exhibit No. 12 marked.) 16 Q You now have in front of you Deposition 17 Exhibit 12, and can you just briefly describe what that 18 is? 19 A "Application for a Place on the Ballot for a 20 General Election for a City, School District or Other 21 Political Subdivision." 22 Q And this is your application that you filed 23 to run for mayor, right? 24 A Yes. 25 Q And you filed it on August 19th, 2022,</p>
Page 26	Page 28

8 (Pages 29 to 32)

<p>1 today?</p> <p>2 A I am not aware.</p> <p>3 Q Okay. Look at paragraph B. Now I have to remember what paragraph B says. Are you aware of any changes that need to be made to paragraph B as you sit here today?</p> <p>7 MR. NAJVAR: Same objection.</p> <p>8 A I'm not aware.</p> <p>9 Q (By Mr. Hicks) Okay. I'll come back to C later, so you can put that aside if you want to.</p> <p>11 I'm next going to hand you two exhibits.</p> <p>12 The first one is --</p> <p>13 (Exhibit No. 14 marked.)</p> <p>14 Q Exhibit 14 are your responses to the city's first set of interrogatories in the case, and Exhibit 15, which you're going to be handed in just a second --</p> <p>18 (Exhibit No. 15 marked.)</p> <p>19 Q -- are your responses to, supplemental responses to the first set of interrogatories. Do you have those in front of you?</p> <p>22 A Yes.</p> <p>23 Q And I'm just going to -- I'm not going to ask whether you want to make changes. I'm just going to assume for now that you don't have any and your</p>	<p>1 A Yes.</p> <p>2 Q You can look. Take your time.</p> <p>3 A I have to remember the live policy forum.</p> <p>4 Q Westminster.</p> <p>5 A Oh, yes. Okay.</p> <p>6 Q Where people like me hang out. Okay. So what is Constant Contact?</p> <p>8 A It is an email service, an email blast service.</p> <p>10 Q How does it work?</p> <p>11 A You can upload email lists and send one email to a group of people.</p> <p>13 Q Where do you get the list?</p> <p>14 A You hopefully obtain them through your campaign website when people go to subscribe to your email blasts. That's --</p> <p>17 Q Is that the principal way?</p> <p>18 A That's the principal way.</p> <p>19 Q Do you know -- how much does it cost?</p> <p>20 A Just for that it would cost to set up your website and make --</p> <p>22 Q Not the website part. I'm sorry. Constant Contact, using it.</p> <p>24 A Oh. I think the cost of Constant Contact, actually, the cost to use it depends on how many emails</p>
Page 33	Page 35

<p>1 attorney will make the decision.</p> <p>2 Look at your response to Interrogatory 3 No. 10, and I think you can look on the supplemental 4 response, the second set, 15. Yeah. I think it starts 5 on page 4, bottom of page 4. I may have that wrong.</p> <p>6 A Tell me -- I'm sorry. Bottom of page 4?</p> <p>7 Q Yeah. You've got a series -- it's response 8 to number 10.</p> <p>9 A Okay. I see it. Yes. Okay.</p> <p>10 Q And it starts -- that response is a long list 11 of campaign communications, right?</p> <p>12 A Yes. Yes.</p> <p>13 Q And they run from pages 4 through 16 of 14 Exhibit 15.</p> <p>15 A Yes.</p> <p>16 Q And in the answer to number 11 there -- you 17 can go look if you want -- you say those things are 18 political advertisements that you've listed there. 19 Okay?</p> <p>20 A Yes.</p> <p>21 Q Okay. And you list different mediums through 22 which you make these communications. You see that?</p> <p>23 A Yes.</p> <p>24 Q Constant Contact, Facebook, Twitter, radio, 25 and a live policy forum, correct?</p>	<p>1 you are actually sending.</p> <p>2 Q Okay. And how many were you sending, 3 roughly?</p> <p>4 A I think it started out around 2,500 persons, 5 maybe got up to 5,000 maybe. I don't -- maybe, maybe 6 just 3,500. I can't remember.</p> <p>7 Q Okay. And the Facebook communications you 8 list here, are they -- I don't do Facebook, so, sorry, 9 I'm going to ask really stupid questions about this. 10 But did you create a special site for your campaign for 11 Facebook communications, or did you use your personal 12 Facebook page?</p> <p>13 A I have a campaign Facebook page.</p> <p>14 Q And is there a cost associated with 15 maintaining that page?</p> <p>16 A No.</p> <p>17 Q And can you tell how many people view it or 18 access it?</p> <p>19 A You can tell how many followers you have.</p> <p>20 Q And how many did you have -- do you have? 21 Did you have, is a better way to ask.</p> <p>22 A I don't know how many I had in --</p> <p>23 Q Roughly?</p> <p>24 A -- 2020, not even roughly.</p> <p>25 Q In 2021 do you know?</p>
Page 34	Page 36

<p>1 A I do not know.</p> <p>2 Q In 2022 do you know?</p> <p>3 A I want to say 1,400. That may or may not be 4 correct.</p> <p>5 Q Is that a situation where you let them follow 6 you, or they choose to follow you whether you want them 7 to or not?</p> <p>8 A They can follow you, or you can invite them 9 to follow you and -- yes. That's how that works.</p> <p>10 Q Okay. And then you have communications 11 through via Twitter. Is there a cost associated with 12 maintaining your Twitter account?</p> <p>13 A No.</p> <p>14 Q And is the Twitter account you're referring 15 to here one specially created for your campaign, or is 16 it just whatever you say regardless of your campaign?</p> <p>17 A It's my campaign Twitter account.</p> <p>18 Q Okay. And can you tell how many people 19 access your tweets on your campaign account?</p> <p>20 A You can. I cannot now, though, because I 21 cannot access the analytics for some reason, but 22 typically you can tell.</p> <p>23 Q When you could, how many were you reaching?</p> <p>24 A It could vary widely from 20 to -- it's been 25 so long since I've been able to access the analytics, I</p>	<p>1 A No.</p> <p>2 Q Look at pages 4 through 5, item 3 of 3 Exhibit 15 I think.</p> <p>4 A I'm sorry, what page?</p> <p>5 Q Bottom of page 4 over to, running over to 6 page 5.</p> <p>7 A Okay.</p> <p>8 Q Is that item 3, is that a -- let me just see 9 if I see it.</p> <p>10 A Yes.</p> <p>11 Q Yes. I'm sorry. May I see that again?</p> <p>12 Yeah. So what is, what is that referring to?</p> <p>13 A That is a Constant Contact email.</p> <p>14 Q About what?</p> <p>15 A "Subject: For Immediate Release: Virden 16 Takes Action in Federal Court."</p> <p>17 Q All right. So your response there 18 characterizes that as a political communication. Why 19 did you consider that a political communication?</p> <p>20 MR. NAJVAR: Objection to the 21 extent it calls for a legal conclusion, but you can 22 answer, Jennifer, if you know.</p> <p>23 A Question again, please?</p> <p>24 Q (By Mr. Hicks) That's a political 25 advertisement, according to your answer there.</p>
---	---

Page 37

Page 39

<p>1 can't remember. A couple thousand, 2,500, I think, or 2 so.</p> <p>3 Q Okay. And then you mentioned radio ads. Do 4 you -- you may have said somewhere in here and I may 5 have missed it, but do you recall the cost of those 6 radio ads?</p> <p>7 A About \$100 for 30 seconds.</p> <p>8 Q And how many did you run? How many times did 9 you run them?</p> <p>10 A I don't recall exactly how many.</p> <p>11 Q Okay. And on the Westminster forum that we 12 talked about were you the only person on the panel 13 presenting, or were there others?</p> <p>14 A Just me. Yes.</p> <p>15 Q And how many people attended that you recall?</p> <p>16 A 40, 30 or 40.</p> <p>17 Q How long did it last, roughly?</p> <p>18 A 45 to 60 minutes.</p> <p>19 Q So for the communications and any costs 20 associated with them that you used before -- between 21 December 15th, 2020 and November 8th, 2021, what source 22 of funds did you use to pay for that?</p> <p>23 A I had leftover campaign funds from the 2020 24 run.</p> <p>25 Q Any other source?</p>	<p>1 A Mm-hm.</p> <p>2 Q Why do you consider telling people about the 3 lawsuit being filed a political advertisement?</p> <p>4 A It's politically related, and I think I 5 probably wanted to inform my campaign supporters that 6 I was taking action regarding something that's 7 politically related regarding campaign contributions.</p> <p>8 Q I guess what I'm trying to understand is, are 9 you saying that this lawsuit is part of your political 10 campaign?</p> <p>11 A I think it would be considered an issue, just 12 like things that are coming across the City of Austin 13 dais about political goings-on in Austin and, I mean, 14 it is politically related. It has to do with campaign 15 contributions in the city of Austin.</p> <p>16 Q Okay. And now I'm going to show you what's 17 been marked as Deposition Exhibit 16. (Exhibit No. 16 marked.)</p> <p>18 Q This is a really easy one. Do you have any 19 change to make to that response?</p> <p>21 A I don't have any changes.</p> <p>22 Q Okay. Next, Deposition Exhibit 17 is being 23 shown to you. (Exhibit No. 17 marked.)</p> <p>25 Q It's headed "First Supplemental Verification</p>
---	--

Page 38

Page 40

10 (Pages 37 to 40)

<p>1 of Jennifer Virden." Do you see that?</p> <p>2 A Yes.</p> <p>3 Q Filed April 1st, 2021 in this lawsuit?</p> <p>4 A Yes.</p> <p>5 Q Okay. Okay. Look at paragraph 3 there, and this is, as I said, April 1, 2021. You say that you want to raise funds to pay for advertisements to run for city office for November 2022 election. Do you see that?</p> <p>10 A Yes.</p> <p>11 Q And this was, you agree, about seven months before the fundraising window under the rules opened, correct?</p> <p>14 A Yes.</p> <p>15 Q There's a discussion in this paragraph. You say that what you mean by wanting to do this is, you want to provide your positions and ideas regarding current issues in Austin. You were free to do that anyway, right, regardless of the fundraising?</p> <p>20 A Yes.</p> <p>21 Q And is it your position that the fundraising window being closed kept you from being able to do it as much or broadcast as much as you want -- wanted to?</p> <p>24 A Correct.</p> <p>25 Q In fact, though, you did spend money staking</p>	<p>1 was a million dollars.</p> <p>2 Q Before November 8th?</p> <p>3 A Before November 8th?</p> <p>4 Q 2021.</p> <p>5 A 2021? Yes. I already knew how much it cost to run for mayor.</p> <p>7 Q No. That -- my -- was your goal to raise a million dollars before November 8th, 2021 in order to be able to get the word out the way you wanted to?</p> <p>10 A The goal is to --</p> <p>11 Q No. Wait. Answer that question.</p> <p>12 A Say it again.</p> <p>13 Q Okay. Was your goal to raise a million dollars for your mayoral campaign before November 8th, 2021 in order to get the word out on issues the way you wanted to?</p> <p>17 A Are you asking me if I wanted to, like, already have obtained the goal of one million dollars by that date?</p> <p>20 Q Did you, did you have a goal in mind of that amount?</p> <p>22 A Yes.</p> <p>23 Q Okay. And did you have any understanding or reasonable basis for expecting that you could raise a million dollars for your mayoral campaign before</p>
<p style="text-align: center;">Page 41</p>	<p style="text-align: center;">Page 43</p>

1 that position before November 8, 2021, didn't you, on
2 public issues in Austin?

3 A Yes.

4 Q Do you have some understanding, or did you then have some understanding, of how much more you thought you needed to spend or wanted to spend to do that?

8 A Wanted to receive contributions --

9 Q How much --

10 A -- and plan on my plan spending. Yes.

11 Q How much more?

12 A As much as possible.

13 Q Well, I mean, did you have any estimation in mind when you wrote this of how much it was?

15 A If I were going to be running for mayor, I knew historically that it takes a million-plus dollars to run for mayor typically in this town, and I knew I wanted to start raising money as soon as possible to build my funds and then as quickly as possible to also know how I could budget them throughout the campaign before November 8th, 2022.

22 Q But did you know how much more you needed to raise in this period between this declaration and the November 8th period? Did you have an estimation of it?

25 A I'm going to say yes. I wanted to -- my goal

1 November 8th, 2021 without the fundraising-window restriction?

3 A Are you saying if it weren't in place --

4 Q Yes.

5 A -- would I have expected to be able to do that?

7 Q By November 8th, 2021, yes.

8 A Well, are you saying that I would have expected to have raised a million dollars by November 8th, 2021?

11 Q Yes.

12 A No. I don't believe so.

13 Q How much did you expect you would have been able to raise?

15 A I didn't have any dollar amount expectation exactly. I just didn't.

17 Q Why?

18 A Because the goal in my mind was to raise as much as possible. It wasn't an exact dollar amount. And also, it gets raised -- it doesn't all come in an even pace.

22 Q Right. But how much -- I mean, you're saying that the restriction kept you from getting the word out the way you wanted to because you couldn't raise the money you wanted to. So I would assume, and this is

1 what I'm trying to get clarity on, that you had some
 2 sense of how much was enough for you to be able to get
 3 the word out the way you wanted to before November 8th,
 4 2021. Can you tell me that?

5 A No.

6 MR. HICKS: Let's look at Tab 13.
 7 (Exhibit No. 18 marked.)

8 Q You now have before you Deposition
 9 Exhibit 18. This is your second supplemental
 10 verification, right?

11 A Yes.

12 Q And in there you describe some political ads
 13 you ran and state that you paid \$2,205 in leftover
 14 funds from your District 10 race account?

15 A Yes.

16 Q And then you say -- and if I'm saying this
 17 wrong, correct me. Then you say that you would have
 18 spent more for ads but couldn't because you couldn't
 19 raise funds. Do you see that?

20 A Yes.

21 Q And do you stick by that assertion today?

22 A Yes.

23 (Exhibit No. 19 marked.)

24 Q You have Deposition Exhibit 19. Now, the
 25 first few pages of that are a pleading; it's your

Page 45

1 supporters actually contribute to the political
 2 movement. That's the part that they do. They, they
 3 give me money, and then I go out and I'm the figurehead
 4 and the speaker for the movement, and I'm the candidate
 5 that they're supporting.

6 But when they're not able to do the part
 7 that they do, which is give you money so that you can
 8 spread the message that's completely in direct
 9 contradiction to what's actually happening in the city
 10 of Austin in the lockstep, unison voice on the City of
 11 Austin dais, then it just sucks the oxygen right out of
 12 the campaign. It just kills it.

13 And then, so then you've got to wait.
 14 In my case I had to wait, what, 10 or 11 months before
 15 I could start receiving money again? So then meanwhile
 16 all your supporters have com- they've just completely
 17 disengaged from -- they think that the cycle's over,
 18 we're not doing anything until November 8th. So then
 19 I've got to go restart everybody, recontact everybody,
 20 get everybody back engaged.

21 And also, that's 11 months when I don't
 22 have time to continue building up my, my campaign war
 23 chest to compete against incumbents, or anybody who
 24 happens to be even a candidate who is not an incumbent
 25 who is actually a member of Austin's political

Page 47

1 applications for a temporary restraining order that
 2 your attorney filed. But the last two pages I believe
 3 of it -- last page -- is a verification dated May 26,
 4 2021 by you saying all the facts stated in the
 5 application are true and within your knowledge. Do you
 6 see that?

7 A Yes.

8 Q In the text of the pleading you assert, and
 9 I'll find the page, that not being able to raise funds
 10 in the pre-November 8, 2021 period irreparably injured
 11 you. You can read that if you want to.

12 What does -- what's your understanding
 13 of how you were irreparably injured in your mayoral
 14 campaign by not being able to raise funds before
 15 November 8, 2021?

16 A There are several ways, actually. First of
 17 all, I was not able to parlay the momentum that I had
 18 coming out of that District 10 runoff in which I
 19 nearly defeated a very well-funded incumbent as a
 20 first-time candidate. So then I lost the momentum with
 21 all -- with my supporters. When you're not able to
 22 continue to receive contributions when everybody's
 23 fired up about your platform, they assume the cycle's
 24 over. But if they're still -- if they're allowed to
 25 continue to make contributions, that's how your

1 establishment, and that's the anointed one. We have a
 2 group of Austinites, very well-funded, that when they
 3 decide that they have anointed their chosen candidate,
 4 they as a couple contribute the max -- in this case now
 5 it's \$900 per couple -- and that's what they do. They
 6 get behind.

7 So they -- and in this case I think we
 8 can -- we'll just say we know it's Kirk Watson in the
 9 mayoral race. So now I'm, I'm not the anointed one, so
 10 I could definitely have used another 11 months to keep
 11 receiving my campaign contributions from a whole lot
 12 more people, because not everybody is able to afford to
 13 contribute the max, especially as a couple. So now I
 14 could have used, as a challenging candidate to the
 15 in-unison voice of the City of Austin, I could have
 16 used that additional time to get hundreds if not
 17 thousands of more smaller-dollar donations, whereas the
 18 anointed ones with the political establishment here in
 19 Austin, it's a few hundred -- it's a few thousand
 20 people that have to max out at \$450 per person.

21 It's just not, it's not -- the whole
 22 reason that I understand that we have this temporal
 23 window is to prevent corruption, when in fact, in my
 24 opinion as an experienced candidate now, it is
 25 completely -- works completely in direct contradiction

Page 46

Page 48

12 (Pages 45 to 48)

1 to preventing corruption. Because now we have a
 2 political establishment in Austin of a few hundred
 3 people who get together, decide who their chosen
 4 candidate is, and then they immediately throw max
 5 contributions at that candidate, making it very
 6 difficult for people like me, a challenging candidate,
 7 to fundraise equally, because we have a limited number
 8 of people in Austin that actually make political
 9 contributions.

10 Q This deposition may go on a little longer
 11 than I thought if every answer's that long. So --

12 A That's an important answer.

13 Q Okay. So you said it killed your campaign,
 14 but you're still campaigning. Can you explain that?

15 A Still campaigning?

16 Q Yeah. You said --

17 A I'm still campaigning.

18 Q You said this rule killed your campaign.

19 A It sucks the oxygen out of it.

20 Q Well, you said it killed the campaign. I
 21 want to know what you meant.

22 A Okay. So I rephrase that: Slowed the
 23 momentum.

24 Q Okay. And this started off with the question
 25 how did it irreparably harm it. Not how did it harm

Page 49

Page 51

1 Q Wait, wait. Answer my question.
 2 MR. NAJVAR: You can answer it the
 3 way you want to answer it.

4 Q (By Mr. Hicks) No. You have to answer it
 5 truthfully, and you have to answer the question.

6 A Please restate the question.

7 Q So the reality you've described about the way
 8 the political establishment operates here and the
 9 ability to raise funds by those people -- you use Kirk
 10 Watson as an example -- that reality was there
 11 pre-November 8, 2021, correct? Correct?

12 A Correct.

13 Q Okay. Now, you also said in your answer
 14 earlier that -- you said, Hey, the justification given
 15 for this -- your lawyer can ask you.

16 A No. I'd like to --

17 Q Your lawyer can ask you a question if you
 18 need to clarify. The, the -- you said in -- you
 19 referred to the justification for the temporal
 20 restriction as being to prevent corruption or the
 21 appearance -- we didn't say "appearance of corruption";
 22 that's part of it too. You said this is in direct
 23 contradiction to that, this arrangement --

24 A Mm-hm.

25 Q -- because of what you went through. so

1 it; how did it irreparably --

2 A It irreparably --

3 Q -- harm it?

4 A I can't go back 11 months and tell everybody,
 5 Oh, hey, by the way, Kirk Watson's going to enter in a
 6 few months, because I didn't know. So, you know, if
 7 you -- that was strategic on his part. He knew that
 8 he, he was already -- he's in the ex-mayor's club.
 9 They go to lunch once a month. Every single ex-mayor
 10 in Austin goes to lunch once a month. They're all in
 11 the political establishment.

12 When you have a candidate who happens
 13 to be an ex-mayor, that's a problem. Obviously he's
 14 going to be the political establishment's chosen
 15 candidate, because they already know from 1997 to 2021
 16 exactly how he's going to vote on every issue. He's
 17 the predictable candidate. He's in the good old boy's
 18 club, the political establishment. He's the one that
 19 they trust, and he's the one that's going to get the
 20 majority of the political contributions.

21 Q So would --

22 A And that's just reality.

23 Q And so that reality would apply pre-November
 24 8, 2021 too, right?

25 A If I had been able to --

Page 50

1 direct contradiction, it sounds like you're saying it
 2 causes corruption; is that correct? Is that what
 3 you're saying?

4 A I think it exacerbates corruption.

5 Q Okay. And what is the corruption?

6 A It prevents challengers like me --

7 Q No. What is the corruption that it
 8 exacerbates?

9 A They, they know that if you're within one
 10 year of an election, that gives -- and they -- I've
 11 even had them tell me that. They like it to be that
 12 way because they like to evaluate the slate of
 13 candidates so they can choose the one that they want to
 14 get behind. I've actually had them tell me that.

15 Q Yeah. And --

16 A So I know it's true.

17 Q And you consider that corruption.

18 A I consider it manipulation. I consider it, I
 19 consider it keeping the smaller donors who would more
 20 likely be able to make a difference in a campaign over
 21 a longer period of time. When you just shrink it down
 22 to a year, I don't -- I, I think it plays much more in
 23 favor of the political establishment.

24 Q Is that corruption, is my question. You used
 25 the term.

Page 52

13 (Pages 49 to 52)

1 A I used the term because that's my
 2 understanding, that the reason we have a fundraising
 3 window is to prevent corruption. Is that correct? I
 4 don't know. That's my understanding.

5 Q You said this is in contradiction to that,
 6 which suggested to me, as I prefaced the question, that
 7 you think this is a corrupt arrangement. And my
 8 question is, how is it corrupt?

9 A So I --

10 Q You described things you don't like about it.
 11 I'm just asking how --

12 A Okay. So let --

13 Q -- it's corrupt.

14 A So I'll, I'll change that. Maybe I don't
 15 know if it's corrupt or not. I just in my opinion as a
 16 candidate, I do not think it's fair.

17 Q Okay. Also in the Exhibit 19 -- and I need
 18 to look at it to find the page to refer to.

19 MR. HICKS: What tab is that?

20 MS. NORTON: It's Exhibit No. 19.

21 MR. HICKS: I've got it.

22 Q Sorry. Just give me one second to find the
 23 reference I wanted to ask you about. Go to page 3 of
 24 that exhibit, and it's under Roman numeral II, the
 25 second paragraph. It speaks of you verifying your

1 Q Okay. So what does actually affecting city
 2 decisions have to do with your campaign for mayor?
 3 That is, one is actually governance in a sense right?
 4 And one is: I'm running on these issues. Can we --
 5 I'm not doubting it. I just want you to explain what
 6 the link is.

7 A By that time I had my political -- my
 8 platform did run contradictory to most of the Austin
 9 city council members, and --

10 Q You mean their positions?

11 A Their positions. And because my District 10
 12 city council race was so high profile and because we
 13 nearly did flip that seat, just like in District 6,
 14 people were paying attention to the things I had to
 15 say. And I do believe that council members would take
 16 a moment to look into the -- see what Jennifer Virden
 17 had said about a certain issue and possibly...

18 Q So who are the people that are paying
 19 attention to what you had to say? You mean in District
 20 10?

21 A I think District 10 was paying attention. I
 22 think that city council members were paying attention
 23 or were interested to see what I had to say about
 24 certain things.

25 Q What more could you ask?

Page 53

Page 55

1 desire to speak on issues in a timely manner. Do you
 2 see that?

3 A Yes.

4 Q "As they arise in Austin politics and
 5 discussions."

6 A Mm-hm. Yes.

7 Q You did speak out, did you not, on Austin
 8 politics and discussions at the time --

9 A Yes.

10 Q -- they were made, didn't you?

11 A Yes.

12 Q Okay. This didn't keep you from speaking
 13 out.

14 A It didn't -- it kept me from speaking out as
 15 broadly as I would have much more preferred.

16 Q But it didn't keep you from speaking out,
 17 correct?

18 A Correct.

19 Q And in here, and I can go find the exact spot
 20 if you want, you also say that raising money and
 21 speaking on these issues in a timely manner would let
 22 you build momentum that could affect city decisions.

23 A Mm-hm. Yes.

24 Q Do you recall that?

25 A Yes.

1 A What more could I ask?

2 Q You got their attention, the city council's
 3 attention with your issues, right?

4 A Getting the city council's attention is
 5 completely different than campaigning and winning an
 6 election.

7 Q Right. Well, that's the reason, that's the
 8 reason I started this question. You said you wanted to
 9 affect their decisions. That's completely different
 10 than running and winning an election, right?

11 A Say that again?

12 Q I'd asked you what the connection is, the
 13 link is between affecting city decisions and running
 14 the campaign, and I thought you just then said they're
 15 two completely different things.

16 A Affecting their decisions, I don't know if I
 17 affected anyone's decision on city council --

18 Q No, no. That's not my question though.
 19 I'm not asking did you affect them, but if you did
 20 affect them or whether you did or not, that's a
 21 different question than something about the campaign
 22 itself, as I understood your answer just then. You can
 23 say what -- correct it any other way you want. Am I
 24 right about that statement?

25 A Say the statement again?

Page 54

Page 56

14 (Pages 53 to 56)

<p>1 Q Okay. Let's, let's start -- I won't say it 2 back. I'll just try to phrase it clearer. 3 Is there a link between actually 4 affecting city decisions, which is one of the things 5 you say in Exhibit 19 that you wanted to be able to do 6 but couldn't because of the fundraising-window rule, 7 and actually conducting and trying to win a campaign? 8 A Is there a link between those two? 9 Q Yes. 10 A I can't -- I don't, I don't understand that 11 question. 12 Q Okay. So do you stand by the answer you've 13 given so far? 14 A Yes. 15 Q Okay. All right. 16 (Exhibit No. 20 marked.) 17 Q So you have in front of you Deposition 18 Exhibit 20, and I'll tell you what it is and you can 19 tell me if I'm getting it wrong, and your attorney can 20 too. 21 These -- this is a set of 10 22 declarations from individuals. I think you're probably 23 familiar with them. 24 A Yes. 25 Q These are declarations that were submitted in</p>	<p>1 A Yes. 2 Q And then you let them fill in the blank on 3 the amount they would be willing -- I mean, you let 4 them do what they wanted to do, but you left a blank 5 for them to fill for the amount they'd be willing to 6 do, correct? 7 A Yes. 8 Q What about the three people you didn't list 9 as not knowing them personally? How did you reach 10 them? 11 A Well, I believe, for example, possibly Robert 12 Davis knew Cody Penna. 13 Q Uh-huh. 14 A And maybe he asked him if he wanted to. I 15 don't remember Richard Wempe, so I don't know how he 16 got his. William Hertel, the name is familiar, but I 17 don't remember how he got his. 18 Q Okay. Are you still in touch with these 19 people in connection with this campaign, any of these 20 people? 21 A Yes. 22 Q Which ones? 23 A Let's see. I could be with Robert if I 24 wanted to. 25 Q What does that mean?</p>
Page 57	Page 59

<p>1 the prior pleadings in this case as attachments. 2 A Yes. 3 Q Primarily during the time of the temporary -- 4 of the preliminary injunction efforts. And I won't go 5 through what they're saying, yet anyway. 6 My question is, did you personally know 7 any of these people? 8 A Yes. 9 Q Which ones? 10 A Robert Davis, Gean Oliphint, Kevin Dunlevy, 11 Linda Durnin, Susan Friedrich, William Clark, John 12 Fisher. 13 Q Who's -- Fisher? That was the last name? 14 A John Fisher. 15 Q So did you ask them to submit these 16 declarations? 17 A I did ask them if they would be -- if this 18 spoke to them and, if it did, please sign it and give 19 it back to me. 20 Q So you had a draft, and I don't want to know 21 about your communications with your attorney, but I'm 22 fairly confident you probably worked with him closely 23 on this. But you had a draft of a declaration to say, 24 If you think this is true for you, will you sign this? 25 Is that basically?</p>	<p>1 A I mean, I mean I know where he is. We don't 2 stay in touch. I mean I know where he works and 3 everything. I don't believe I've spoken with Richard 4 or Cody. 5 Q Can you say the last names -- 6 A Yeah. Sure. 7 Q -- just so it's clear? 8 A So I don't believe I've spoken with Cody 9 Penna; I haven't spoken with Robert Davis in a few 10 months; Richard Wempe, I don't recall speaking with 11 him; Gean Oliphint, we keep in touch on social media; 12 Kevin Dunlevy, we keep in touch on social media. I 13 actually saw Gean not too long ago. William Hertel I 14 don't recall; Linda Durnin, I see her out and about, 15 and she's also on social media; Susan Friedrich, I see 16 her out and about, and she's also on social media; Will 17 Clark, William Clark is -- I still keep in touch with 18 him by text and phone and social media; and John 19 Fisher, I keep in touch with him also. 20 Q Okay. On Mr. Clark, and I can find the exact 21 document, which I have -- 22 A Mm-hm. 23 Q -- but he -- the records reflect that he was 24 also paid by your 2020 campaign, correct? 25 A Mm-hm. Yes.</p>
Page 58	Page 60

15 (Pages 57 to 60)

1 Q And he was paid for doing what?
2 A He was my volunteer coordinator.
3 Q Does he -- is he a paid worker on
4 your 20 -- on this campaign, the --
5 A No.
6 Q -- mayor campaign?
7 MR. NAJVAR: Renea, just -- can you
8 aim for a break in a few minutes?
9 MR. HICKS: Sure. Whenever. Let
10 me, let me -- I'm about finished with this little
11 section, so --
12 MR. NAJVAR: Okay. Sure. Yeah.
13 MR. HICKS: In fact, just two quick
14 things, and I think then would be a good breaking
15 point. Is that okay?
16 MR. NAJVAR: That's fine. Yeah.
17 Q (By Mr. Hicks) So beyond these 10 people,
18 did you contact other people and ask them to sign a
19 similar declaration and then they said they didn't want
20 to?
21 A Possibly a few. Not many, if so.
22 Q Do you know any of them? Can you name any of
23 them?
24 A No.
25 Q How many?

1 A Yes. I see this.

2 Q Do you know this person?

3 A I don't.

4 Q How did this come onto your radar screen, so

5 to speak?

6 A It's a tweet. It was a response to a tweet,

7 or he -- let's see. He was replying to CariMarshallTX.

8 "Thanks for getting the word out for @Jennifer4Austin,

9 now I can go donate to her campaign." So that was

10 Hendrix replying to Cari Marshall. Perhaps Cari

11 Marshall had said something about my campaign.

12 Q Okay. I just couldn't follow it. Do you, do

13 you know either -- you don't know Mr. Hendrix, right?

14 A I do not.

15 Q And do you know Cari Marshall?

16 A I do not.

17 Q Okay. And there's a picture of this fellow

18 there in between. Is that Jerad Najvar?

19 A It looks like him.

20 MR. NAJVAR: Yeah.

21 Q (By Mr. Hicks) Do you know why he's in this

22 tweet?

23 A I do not know.

24 Q Tweet stream, is that what you call it?

25 A Thread maybe. I don't know.

Page 61

Page 63

Q Thread, that's a good -- better word.

MR. HICKS: Okay. Let's take a break.

(At 1:32 p.m. the proceedings recessed, continuing at 1:40 p.m.)

(Exhibit No. 22 marked.)

Q (By Mr. Hicks) Okay. I'm going to show you Deposition Exhibit 22. You see this is your first amended complaint?

A Yes.

Q Filed still before Mr. Clark was added as a co-plaintiff, you see that?

A Yes.

Q Look at paragraph 23. And I probably should have looked to see if the same paragraph is in the amended exhibit -- I mean in the second amended complaint, but let's go with this one for now. In paragraph 23 on page 6 --

A I'm skipping.

Q Well, read that to yourself, that paragraph to yourself.

A I did.

Q Okay. This is a new paragraph that was added in the amended complaint. Do you recall adding it?

A (Shaking head)

Page 62

Page 64

16 (Pages 61 to 64)

<p>1 Q No?</p> <p>2 A I do not recall that.</p> <p>3 Q Okay.</p> <p>4 A But we're talking about paragraph 23, right?</p> <p>5 Q Yeah. 23, yeah. There's not an allegation -- I'll just represent to you, and the record can show, the original complaint did not have an allegation about making campaign contributions by you. But that's just me talking to you, that's not you testifying. So that's the reason I'm asking you about it though.</p> <p>12 You said that in addition, you wanted to be able to -- you basically say, and to your claims that you want to be able to raise funds as a candidate, here you say you desire "to be free to make campaign contributions to other candidates for Austin office that those candidates can accept and use more than a year in advance of the relevant election date." Do you see that that's a fair summary of what you say there?</p> <p>20 A Yes.</p> <p>21 Q Now, you made this allegation in April of, April 26 of 2022, and at that time the fundraising window was open, correct?</p> <p>24 A Yes.</p> <p>25 Q So this is necessarily, it seems to me,</p>	<p>1 could have done to me prior to the fundraising window opening.</p> <p>3 Q But for that kind of contribution to happen it has to be somebody that fits the bill for your support, correct?</p> <p>6 A Correct.</p> <p>7 Q And right now we don't know if there's anyone of that sort, right?</p> <p>9 A Correct.</p> <p>10 Q Okay. For you thinking about this thing you want to do in the future, what does it mean to you to be able to contribute money to somebody you support outside the window?</p> <p>14 A Well, I wouldn't support anybody financially outside of a window.</p> <p>16 Q But you know what I mean. Okay.</p> <p>17 A But --</p> <p>18 Q All right. Outside the fundraising window, that's --</p> <p>20 A Because now I know --</p> <p>21 Q -- a good joke there.</p> <p>22 A Now I know how important it is. Now that I've been a candidate now I understand why we need to be financially contributing to candidates that we support so that they can build their war chest and</p>
Page 65	Page 67

<p>1 got this go-to set of people and you're new. So why 2 doesn't that hurt you even more?</p> <p>3 A Because if the fundraising window had been 4 open before Kirk Watson decided he was going to run for 5 mayor, those people would have contributed to me like 6 they did in my District 10 run. They were supporters 7 of mine through District 10, and they didn't know Kirk 8 was going to run yet. But because that window got 9 small within one year, just like they like it, just 10 like they told me they like it -- they don't want it to 11 be any bigger than one year, because they want to know 12 what the final slate is so they can pick their 13 candidate and, and get a hundred percent behind that 14 candidate. It's just unfair to challengers.</p> <p>15 Q That's not my question.</p> <p>16 A Not, not politically well-connected --</p> <p>17 MR. HICKS: Objection, 18 nonresponsive.</p> <p>19 Q So my question was about those candidates 20 that are -- you're, you're calling them Kirk Watson 21 type candidates, basically, right?</p> <p>22 A He's an example. Yes.</p> <p>23 Q Yes. So they can also raise money during 24 that same period and, from the way you're describing 25 it, swamp your fundraising, right? During the</p>	<p>1 A Yes. 2 Q And it's dated October 27, 2020. 3 A Correct. 4 Q Filed then, right? 5 A Correct. 6 Q Okay. Look at the third page. They aren't 7 numbered, so it makes it a little difficult. And by 8 the third page, that -- the third page would be the 9 second page you turn to. Yeah. 10 A Okay. 11 Q Okay. Look at box 6. 12 A Yes. 13 Q It shows a \$50,000 loan to the campaign, 14 right? 15 A Yes. 16 Q And it was still outstanding as of October 17 24, 2020, correct? 18 A Yes. 19 Q Okay. Hold that exhibit in front of you, but 20 I'm going to give you another exhibit. 21 (Exhibit No. 24 marked.) 22 Q So now look at Exhibit -- 23 THE REPORTER: 24. 24 Q -- 24. This is -- this is two-sided 25 also -- a campaign finance report filed by you on June</p>
<p style="text-align: center;">Page 69</p>	<p style="text-align: center;">Page 71</p>

<p>1 A Correct.</p> <p>2 Q All right. Now go to -- this is unfair, but</p> <p>3 the 75th page, which is, it's the, it's the Schedule E</p> <p>4 for Loans.</p> <p>5 A Okay. Yeah. I have it.</p> <p>6 Q Did you find it? I haven't found it yet.</p> <p>7 That shows that you made the loan to your campaign on</p> <p>8 September 23, 2020, correct?</p> <p>9 A Correct.</p> <p>10 Q And it shows a maturity date of December</p> <p>11 15th, 2020. What is a maturity date here?</p> <p>12 A Maturity date is when a note matures, but I</p> <p>13 figured that was the runoff date. I guess that's why I</p> <p>14 put that in there, the runoff date.</p> <p>15 Q So did you intend this loan to be to the</p> <p>16 general election campaign, not to the runoff campaign?</p> <p>17 A That's a good question. Did I intend the</p> <p>18 loan -- ask it again, please?</p> <p>19 Q Did you intend the loan to be just for the</p> <p>20 general election campaign or for the runoff campaign,</p> <p>21 or for whatever you were in at the time?</p> <p>22 A I didn't really determine that that way. I</p> <p>23 determined it knowing that I was going to pay myself</p> <p>24 back at the -- when we were closing out the books for</p> <p>25 the campaign, because -- well, see, when did I make the</p>	<p>1 didn't feel like I was going to need to have to spend</p> <p>2 that money and not be paid back from contributions.</p> <p>3 Q And when did that realization happen?</p> <p>4 A It didn't take long. I was only in this</p> <p>5 thing three and a half months.</p> <p>6 Q I know, but when?</p> <p>7 A I don't know. It was the three and a half</p> <p>8 months from beginning to end.</p> <p>9 Q Okay.</p> <p>10 MR. HICKS: All right. Let's look</p> <p>11 at Tab 21.</p> <p>12 (Exhibit No. 25 marked.)</p> <p>13 Q Now look at Deposition Exhibit 25. It's</p> <p>14 another --</p> <p>15 THE REPORTER: 21.</p> <p>16 THE WITNESS: No. It's 25.</p> <p>17 MR. HICKS: 25.</p> <p>18 THE REPORTER: Did I write that</p> <p>19 down wrong? Sorry. Go ahead.</p> <p>20 THE WITNESS: Yeah, tricked Sandy.</p> <p>21 You said 21 because I said Tab 21.</p> <p>22 THE REPORTER: You're right.</p> <p>23 That's what I did.</p> <p>24 Q So look on the second page there. I believe</p> <p>25 there's another box 6, is there not?</p>
Page 73	Page 75

<p>1 loan again, September?</p> <p>2 Q It shows on that Exhibit 24 on the 75th page,</p> <p>3 which is the --</p> <p>4 A So when I made myself the loan --</p> <p>5 Q Right. Let me just finish that. It shows</p> <p>6 September 23rd, 2020.</p> <p>7 A So when I did loan my campaign money I didn't</p> <p>8 know yet whether or not I was going to make the runoff.</p> <p>9 Q Right.</p> <p>10 A But...</p> <p>11 Q I'm not -- it's no trick.</p> <p>12 A But that --</p> <p>13 Q I'm just trying to understand.</p> <p>14 A But that's where that date came from.</p> <p>15 Q Yeah. Okay.</p> <p>16 A I knew that that was the runoff date.</p> <p>17 Q But you just, you made the loan to your</p> <p>18 campaign for use in any campaign activity you needed it</p> <p>19 for, needed the money for, right?</p> <p>20 A Yes.</p> <p>21 Q Okay. Now, you said you knew you were going</p> <p>22 to be paid back that loan. How did you know you'd have</p> <p>23 enough money to pay it back?</p> <p>24 A Because I was getting contributions in so</p> <p>25 well and I knew that I wasn't going to need that. I</p>	<p>1 A Yes.</p> <p>2 Q Now, let's go back just for a second. This</p> <p>3 is dated January 15th, 2021.</p> <p>4 A Correct.</p> <p>5 Q And it shows on the second page that there's</p> <p>6 no outstanding loan.</p> <p>7 A Correct.</p> <p>8 Q So when was the loan paid off?</p> <p>9 A Let me look back at the dates here.</p> <p>10 Q I just had a hard time following this.</p> <p>11 A Okay. Let me look. I don't really know for</p> <p>12 sure.</p> <p>13 Q Take your time.</p> <p>14 A (Crosstalk) deduce it. Okay. So we have</p> <p>15 2020...</p> <p>16 Q I have my window of when it may have been --</p> <p>17 A Okay.</p> <p>18 Q -- if that will help you. So it looks like</p> <p>19 to me from looking at these three exhibits --</p> <p>20 A Mm-hm.</p> <p>21 Q -- that we're just talking about, which are</p> <p>22 23, 24, and 25, that this \$50,000 loan, which was for</p> <p>23 the District 10 race, was paid off somewhere between</p> <p>24 September 23rd, 2020 and January 15th, 2021, somewhere</p> <p>25 in there, in that window; is that right?</p>
Page 74	Page 76

1 A I can't say yes or no. Let me look at these
 2 dates again. Okay. So 2020, 1/15/2021. So when do
 3 you think it was paid off?
 4 Q Best I can tell, somewhere between September
 5 23rd, 2020 and January 15th, 2021, and I can tell you
 6 how I got there. You show you made a loan to your
 7 campaign on September 23rd, 2020 --
 8 A Mm-hm.
 9 Q -- in one of those exhibits.
 10 A Mm-hm.
 11 Q And then on January 15th, 2021 you show a
 12 zero balance.
 13 A Mm-hm. Yes.
 14 Q Actually, we can narrow it even further,
 15 because Exhibit 23 I believe shows that it was still
 16 outstanding as of October 24th, 2020.
 17 A Mm-hm. Yes.
 18 Q Well, we can narrow it further, because this
 19 is where I'm confused. Exhibit 24 shows a balance of
 20 \$50,000, but this is a June 18th, 2021 filing.
 21 A Mm-hm.
 22 Q This is not playing tricks. I'm just trying
 23 to understand.
 24 A No. It's no trick.
 25 Q So it appears that something's messed up

Page 77

1 A Yes.
 2 Q And it was fully paid off, right?
 3 A Yes.
 4 Q Okay. Now we're going to look at the same
 5 three exhibits. Look at 23 first.
 6 A Okay.
 7 Q And at -- let's see. For Exhibit 23 --
 8 A Yes.
 9 Q -- I'll represent to you, and you're welcome
 10 to look through if you want, that I did a word search
 11 for each of the 10 people in Exhibit 20 --
 12 A Okay.
 13 Q -- and found that none of them made
 14 contributions to you in -- listed as having made
 15 contributions to you during that period covered by that
 16 report.
 17 A Okay.
 18 Q Do you have any reason to doubt that?
 19 A Well, it would surprise me that Will Clark
 20 didn't, but...
 21 Q He was paid \$2,000 in that period.
 22 A Oh, maybe he had already maxed out. Let's
 23 see.
 24 Q No. There's no record of contributions by
 25 him.

Page 79

1 here; am I right?
 2 A I'm just wondering did I file a correction?
 3 Q And you didn't correct this I bet.
 4 A Well, that is a correction.
 5 Q Hard to say?
 6 A Hard to say.
 7 Q Okay. But whenever it was, it was paid -- do
 8 you -- it was paid off at the latest by January 15th,
 9 2021, correct?
 10 A Yes.
 11 Q That's when you show zero balance.
 12 A Let me think about that. Yes. I actually
 13 don't know why --
 14 Q Okay.
 15 A -- this is reflected this way.
 16 Q This is --
 17 A So I think you ask me these questions and
 18 we're going to -- I think we --
 19 Q I don't know that it matters to a blasted
 20 thing in the world either, but I just want to try to
 21 get some clarity on it.
 22 So what was the source of the loan
 23 repayment?
 24 A Campaign contributions.
 25 Q And only that, right?

Page 78

1 A Okay. Well, I believe you.
 2 Q Anyway, if you have reason to think -- I
 3 understand -- what I'm saying is in there is not
 4 evidence. What it's in there is evidence. I get that.
 5 I'm just trying to help us work through this so I can
 6 understand.
 7 MR. NAJVAR: And which report are
 8 you saying it's not in?
 9 MR. HICKS: Exhibit -- there is no
 10 record in Exhibit 23 of any of the 10 individuals in
 11 Exhibit --
 12 MS. NORTON: 20.
 13 Q -- 20 that have declarations there, having
 14 made a contribution to you during the period covered by
 15 that.
 16 A Okay.
 17 Q Now look at Exhibit 24. All right. Now look
 18 at Exhibit 24. Yeah. And I, I've looked in that
 19 report, and I find only two of the 10 individuals we've
 20 been talking about made contributions. One is
 21 Mr. Clark, and I can tell you the page number if it
 22 helps you. It's on the 14th page of the PDF. It shows
 23 a \$200 contribution from Mr. Clark on August 31, 2020.
 24 A Okay.
 25 Q And you can doublecheck if you want. And on

Page 80

20 (Pages 77 to 80)

<p>1 the 22nd page it shows a \$50 contribution from Susan 2 Friedrich. Is it FREED-rik or FREED-rich? 3 A FREED-rik is what I say. 4 Q Okay. \$50 on September 18th, 2020. 5 A Mm-hm. 6 Q Does that sound -- 7 A I'm sorry, I'm looking for one more thing. 8 Just one second, please. 9 Q Okay. It's the 14th page, which -- 10 A I believe you, I'm just -- 11 Q Do you see -- 12 A So I want, I want -- 13 Q They aren't numbered, so -- 14 A No. But I did want to point out something. 15 Q Okay. 16 A So, well, it is just Will Clark, but his, his 17 wife did also contribute. She has a hyphenated last 18 name. And then you wanted me to look for Friedrich? 19 Q Susan Friedrich. She's on the 22nd page, \$50 20 on September 18th, 2021. 21 A Okay. All right. 22 Q And I see no contributions from any of the 23 other individuals. 24 A Okay. 25 Q All right. Then for Exhibit --</p>	<p>1 to get some clarity on who's who and where. 2 MR. NAJVAR: Okay. Yeah. Just it 3 was confusing me. 4 A So are we done with these? 5 Q (By Mr. Hicks) I think so. Yeah. But let's 6 look now at Exhibit -- 7 A 27? 8 Q Let me just make sure. Yes. 27. 9 (Exhibit No. 27 marked.) 10 Q And I'll represent to you that I've gone 11 through and I find only two contributions -- I mean 12 only two of them, of the 10 people, contributing: Will 13 Clark \$400 on November 5th, 2020. That's for the 14 runoff. 15 A Mm-hm. 16 Q It's the day after the election I think, the 17 general election. That's on the 25th page. The 31st 18 page Kevin Dunlevy \$400 on November 20th, 2020 for the 19 runoff. Does that sound right to you? 20 A Yes. 21 Q Okay. So did you not know the other people, 22 the other people that didn't contribute during these 23 periods of the, of the 10 people? Did you not know 24 them or have communications with them back then? 25 A I didn't know all of them, but I did know</p>
Page 81	Page 83

<p>1 MS. NORTON: Tab 20? 2 MR. HICKS: Tab 23. 3 MS. NORTON: Oh, Tab 23? Oh, we 4 don't have that one in there (inaudible). 5 MR. HICKS: Let me do it. 6 Q So I'm going to show you a new exhibit. 7 MS. NORTON: Okay, 23. 8 (Exhibit No. 26 marked.) 9 THE REPORTER: 26. 10 MR. HICKS: And this is Exhibit 26. 11 MR. NAJVAR: I'm still a little 12 confused. 13 MR. HICKS: Let me take this one 14 back. 15 MR. NAJVAR: Just so -- to make 16 sure I've got it straight, because you were asking her 17 about these Exhibits 23 and 24, which cover the 18 campaign in 2020 -- 19 MR. HICKS: Yeah. 20 MR. NAJVAR: -- before those 21 contributors gave those (crosstalk) -- 22 MR. HICKS: I understand. Yeah. 23 No, I understand. 24 MR. NAJVAR: I'm just -- 25 MR. HICKS: Yeah. I'm just trying</p>	<p>1 some of them. 2 Q Do you know why the ones you knew didn't make 3 contributions to your campaign? 4 A No. 5 Q Do you know what changed between that period 6 and the time that they made these declarations that we 7 have in evidence that made them decide they would want 8 to contribute to your campaign? 9 A No. 10 Q And we looked at Exhibit 21. That's the 11 tweet exchange -- 12 A Mm-hm. 13 Q -- between you, Twitter exchange between you 14 and Mr. Hendrix. 15 A Mm-hm. 16 Q Do you know whether he ever made a 17 contribution to you? 18 A I don't. 19 Q I'll just represent I looked through and 20 can't find it, but I also don't know what his name is. 21 A Yeah. We don't know what his name is. 22 Q Okay. Now we're to what Jerad wanted to talk 23 about. 24 MR. HICKS: Tab 24. 25 MS. NORTON: Okay.</p>
Page 82	Page 84

21 (Pages 81 to 84)

1 (Exhibit No. 28 marked.)
2 THE REPORTER: 28, it's 28.
3 Q So now you have in front of you Deposition
4 Exhibit 28. That's a campaign finance report filed by
5 you on July 15th, 2021 in connection with the mayoral
6 race, correct?
7 A Yes.
8 Q If you look on the third page, box 5 -- no.
9 Second page, box 5 -- no. Third page. Sorry. Third
10 page, box 5, Schedule F1.
11 A Yes.
12 Q Shows the total for "Political Expenditures
13 from Political Contributions" of \$18,887.39. Is it
14 correct that these con- that the contributions covering
15 these expenditures were leftover contributions from
16 your District 10 race?
17 A No.
18 Q Okay. And was this before or after -- well,
19 okay. So this was filed before the fundraising window
20 opened, correct?
21 A Oh, I'm sorry. This is 2021. I was think
22 it was this year.
23 Q Okay.
24 A Sorry. Can you repeat the question then?
25 Q Okay.

Q And what makes you think that?

A Because I'm pretty sure I paid myself back right after the runoff.

Q While you still had some money, right?

A Yeah.

Q Okay. In the account. Okay. Go to the fourth page now, and that's the page that talks about unitemized -- "Pledged Contributions." Do you see that?

A Yes.

Q And you showed zero in pledges.

A Correct.

Q What is a pledge, an unitemized pledge, to your understanding?

A To my understanding it's a promised contribution in the future.

Q Okay. This was before the window opened, and you had no promised contributions, correct?

A Correct.

Q What would be, in your understanding, what would be a promised contribution?

A Somebody who was going to make a contribution in the future.

Q Can you pull out Exhibit 20? Thank you.

Okay. So look at Exhibit 20 again. These are the 10

Page 85

Page 87

1 A The last question, I think I need to go back
2 to --

3 Q Okay. We're still -- just so the record is
4 clear, this is Deposition Exhibit 28.

5 A Mm-hm.

6 Q And I've asked you to look at the third page,
7 box 5 --

8 A Okay.

9 Q -- which shows nearly \$19,000 in expenditures
10 from contributions.

11 A Yes.

12 Q And this fundraising window was still closed
13 here for the mayoral race, right?

14 A Yes.

15 Q So what was the source of these con- the
16 contributions for these expenditures?

17 A These were leftover contributions --

18 Q Okay.

19 A -- from the 2020 campaign.

20 Q Okay. And were these made before or after
21 repayment of the \$50,000 loan whose date we haven't
22 been clear on yet?

23 A Let me look through these. So these I
24 believe were made after I repaid my -- the loan to
25 myself.

1 declarations. These are all declarations signed before
2 the July 15th report, correct?
3 A Yes.
4 Q Why did you not treat these declarations as
5 promised contributions in that report in Exhibit 28?
6 A I don't think they are promised
7 contributions. I think they're saying that they would
8 if they could if the fundraising window were open. And
9 again, I didn't solicit pledged contributions.
10 Q So you see a pledged contribution as one that
11 you've at least solicited?
12 A Yeah. That I would actually say -- just like
13 at church, a pledged contribution -- I promise I'm
14 going to contribute this on this date. And I never
15 actively solicited pledged contributions.
16 Q So what is the difference in your
17 understanding between a pledged contribution of the
18 sort covered by that particular part of Exhibit 28 and
19 what the people are saying here with respect to their
20 contributions in Exhibit 20? Why are --
21 A I, I --
22 Q -- they not pledged contributions?
23 MR. NAJVAR: And before you -- I'm
24 going to object to the extent it calls for a legal
25 conclusion. But you can answer as far as you

Page 86

Page 88

22 (Pages 85 to 88)

<p>1 understand it or know it.</p> <p>2 A I think they're just different. To my</p> <p>3 opinion, I think this is somebody saying that they</p> <p>4 would if they could.</p> <p>5 Q (By Mr. Hicks) When you say "this" can you</p> <p>6 say what it is?</p> <p>7 A Oh. The verifications.</p> <p>8 Q Exhibit 20?</p> <p>9 A Exhibit 20. I think these are people who are</p> <p>10 saying they would if they could if the fundraising</p> <p>11 window were open. And, and I quite frankly never -- I</p> <p>12 don't understand how pledged contributions work. I've</p> <p>13 never used them and never asked about them, so I don't</p> <p>14 know.</p> <p>15 Q Is there anything in your understanding, and</p> <p>16 I understand there can be legal questions involved in</p> <p>17 this, but I want to know your understanding, not a</p> <p>18 lawyer's, of anything that would have stopped you from</p> <p>19 asking these people in Exhibit 20 to make those pledged</p> <p>20 contributions, to pledge those contributions.</p> <p>21 A It's never crossed my mind to ask for a</p> <p>22 pledged contribution until this very moment.</p> <p>23 Q Okay. See, I'm helping your campaign.</p> <p>24 A Thank you.</p> <p>25 Q Let's see. Okay. Go to the 10th page of</p>	<p>1 Q (By Mr. Hicks) It's here.</p> <p>2 A Okay. I'm still looking. All right.</p> <p>3 Q Do you see that? It's F1 on the 10th page.</p> <p>4 A F1 on the 10th page. I don't --</p> <p>5 Q May I find it for you?</p> <p>6 A Yes, please.</p> <p>7 Q Make it a little easier I think. There it</p> <p>8 is.</p> <p>9 A Okay.</p> <p>10 Q Okay. Do you see you show you have an entry</p> <p>11 there on that page that the payee on 2 -- February 2nd,</p> <p>12 2021 you paid the Najvar Law Firm \$10,000 in legal</p> <p>13 fees?</p> <p>14 A Yes.</p> <p>15 Q Was that in connection with this case?</p> <p>16 A Yes.</p> <p>17 Q And so this relates back to an earlier</p> <p>18 question I was asking. So you consider the legal work</p> <p>19 being done by your lawyer in this case to be part of</p> <p>20 your political effort in the campaign?</p> <p>21 A Yes.</p> <p>22 Q So the lawsuit, the record will reflect that</p> <p>23 the lawsuit was not filed until March 25, 2021, nearly</p> <p>24 two months later. Do you know why you waited two</p> <p>25 months to file the suit?</p>
--	--

Page 89

Page 91

<p>1 Exhibit 28.</p> <p>2 A What does it say on the top of it?</p> <p>3 Q It's, it's campaign expenditures, and it's</p> <p>4 one of the entries there.</p> <p>5 A Okay. Uh --</p> <p>6 Q Let me find it for you and show it to you.</p> <p>7 It's from Jerad's law firm.</p> <p>8 A Okay.</p> <p>9 Q To Jerad's law firm, to Mr. Najvar's law</p> <p>10 firm. Sorry.</p> <p>11 A Okay.</p> <p>12 Q To not be so informal here.</p> <p>13 A I still don't see it. I know --</p> <p>14 Q I'm going to have to find it.</p> <p>15 A -- it's here.</p> <p>16 Q I'm going to have to count.</p> <p>17 MR. HICKS: What exhibit number are</p> <p>18 we at?</p> <p>19 MS. NORTON: 28.</p> <p>20 Q 28, would you look at 28?</p> <p>21 A Yes.</p> <p>22 Q Okay.</p> <p>23 MR. NAJVAR: I think they're in</p> <p>24 alphabetical order, if that helps. Like the payee name</p> <p>25 is arranged in alphabetical order.</p>	<p>1 A It took us awhile to get the, the paperwork</p> <p>2 drawn up I guess. Yeah. I just --</p> <p>3 Q And I don't want to know any conversations</p> <p>4 you had with your lawyer about it, but if you, if you</p> <p>5 know factually why.</p> <p>6 A I don't know factually why. I just know it</p> <p>7 took time.</p> <p>8 Q Okay. Let's go to -- I hate to do this.</p> <p>9 These things are just not numbered easily, but the 22nd</p> <p>10 through the 27th pages, this is where you itemized</p> <p>11 political expenses from personal funds.</p> <p>12 A Okay.</p> <p>13 Q Did you find it?</p> <p>14 A Yes.</p> <p>15 Q Do I understand that these expenditures are</p> <p>16 not from contributions from other people? Correct?</p> <p>17 A Correct. These are -- I made these with</p> <p>18 credit card payments, personal credit card payments.</p> <p>19 Q And that these weren't loans either, right?</p> <p>20 A No.</p> <p>21 Q And you never get reimbursed for these,</p> <p>22 right?</p> <p>23 A No. You do.</p> <p>24 Q How?</p> <p>25 A Through all these reports. Political</p>
---	---

Page 90

Page 92

23 (Pages 89 to 92)

1 expenditures from personal funds, let me remember how
 2 that was done. I really don't recall, it's been so
 3 long since I did this, but I do believe that I got
 4 repaid for these.

5 Q Out of campaign contributions?

6 A Yes.

7 Q So they function as a loan, correct?

8 MR. NAJVAR: Objection to the
 9 extent that calls for a legal conclusion, but you can
 10 answer as far as you know.

11 A I don't think they -- I don't think on these
 12 campaign forms that --

13 Q (By Mr. Hicks) I know that. I'm not asking
 14 that --

15 A Well, I mean --

16 Q -- legal question.

17 A -- there's a loan, there's a personal loan
 18 form that we use, and then if you do it, if you do it
 19 through a credit card, I don't know that it's actually
 20 counted for the same as, like, a \$50,000 loan was.

21 Q Let me ask it this way. So back, for
 22 example -- this is on Exhibit --

23 A It's 28.

24 Q 28. Under the category "Political
 25 Expenditures from Personal Funds," just as an example,

1 Q What's the difference?

2 A Well, the only reason I do is because of the
 3 way we do these forms.

4 Q The reports.

5 A Yes.

6 Q Okay.

7 A Yeah.

8 Q So it's your understanding you don't have to
 9 report this as a loan even if you're expecting a
 10 repayment from the campaign?

11 A That's my understanding.

12 Q Okay.

13 MR. HICKS: Tab 25.

14 (Exhibit No. 29 marked.)

15 Q Now, you've got before you Exhibit 29. It's
 16 another campaign finance report. It's for the mayoral
 17 race, and it was filed January 4th, 2022, correct?

18 A Yes.

19 Q This is your last campaign finance report
 20 that you have filed in the case -- I mean in the race,
 21 right? It's the most --

22 A No. We did one on --

23 Q The most recent one.

24 A We did one on July 15th also, or right before
 25 July 15th.

Page 93

Page 95

1 you have a March 17, 2021 entry, right?

2 A Yes.

3 Q Do you see it?

4 A I'm sorry. Which -- what was the date on it?
 5 March 17th? Okay.

6 Q This is just an example.

7 A Okay. Go ahead.

8 Q Could be any of them.

9 A Yeah.

10 Q And, and it shows on that date you paid \$7.03
 11 to Capital One, right? Now, that was before the
 12 fundraising window opened.

13 A Yes.

14 Q At that time did you have an expectation that
 15 once you could begin raising contributions, that you
 16 could get reimbursed out of those contributions at the
 17 time you made this payment?

18 A I --

19 Q I'm as perplexed as you are about this.

20 A No. Yes. And I -- yes. I did expect to get
 21 repaid for that. Yes.

22 Q Okay. And do you see a difference, from your
 23 personal perspective, not from a legal perspective, a
 24 difference between that and a loan?

25 A I, I do.

1 Q You're right. Sorry. I got ahead of myself.

2 A Okay.

3 Q Okay. Now, this one on the second page, box
 4 6 you show a \$300,000 loan from you to the campaign.

5 A Correct.

6 Q Is that correct?

7 A Yes.

8 Q And now look back at the schedule, Schedule
 9 E, which I can't find.

10 A Okay.

11 Q Did you find it?

12 A Yes.

13 Q Okay. That's the 58th page. It shows you
 14 made this loan in that amount on December 20, 2021,
 15 correct?

16 A Yes.

17 Q And you show no maturity date for this loan,
 18 right?

19 A Correct.

20 Q Do you know why?

21 A I do not know why. I guess because it's not
 22 a required cell to complete, and maybe the last time I
 23 did it I thought it was.

24 Q Okay. So this loan, based on what you -- the
 25 record here shows, and you just agreed with it, was

Page 94

Page 96

24 (Pages 93 to 96)

<p>1 made 42 days after the fundraising window opened --</p> <p>2 A Mm-hm.</p> <p>3 Q -- right?</p> <p>4 A Correct. I guess that's the correct number</p> <p>5 of days.</p> <p>6 Q And you didn't make a loan to the campaign in</p> <p>7 any amount, much less \$300,000, before the fundraising</p> <p>8 window opened, correct?</p> <p>9 A Correct.</p> <p>10 Q Can you explain why?</p> <p>11 A No.</p> <p>12 Q You could have, right?</p> <p>13 A Yes.</p> <p>14 Q Look on back to the second page again, boxes</p> <p>15 4 and 5 there. Do you see those?</p> <p>16 A Yes.</p> <p>17 Q And I'll just round the numbers up. You show</p> <p>18 total political expenditures of about \$21,000 and total</p> <p>19 political contributions of about \$327,000, right?</p> <p>20 A Correct.</p> <p>21 Q Why is there such a small amount of</p> <p>22 expenditures in comparison to the money that's</p> <p>23 available in the contributions?</p> <p>24 A Why is there such a small amount of</p> <p>25 expenditures?</p>	<p>1 contribution balance.</p> <p>2 MR. NAJVAR: Objection to the</p> <p>3 extent the question calls for a legal conclusion.</p> <p>4 Q (By Mr. Hicks) Well, that's a fact question.</p> <p>5 Is the \$326,847.69 that's on the second page of</p> <p>6 Exhibit 29 in box 5, does that total include your --</p> <p>7 A Yeah.</p> <p>8 Q -- \$300,000 loan?</p> <p>9 A That would include my \$300,000 loan to</p> <p>10 myself, to my campaign.</p> <p>11 Q Okay. But that \$300,000 loan, to the extent</p> <p>12 you're treating it as a contribution here, would not</p> <p>13 have been forbidden to be made before the fundraising</p> <p>14 window opened, correct?</p> <p>15 A Okay. Repeat that?</p> <p>16 Q That's kind of convoluted. You could have</p> <p>17 made the \$300,000 loan to your campaign before, legally</p> <p>18 speaking, before the November 8, 2021 window opened for</p> <p>19 fundraising, right?</p> <p>20 A Before the window opened? I wouldn't have.</p> <p>21 Q You wouldn't have been able to make the loan?</p> <p>22 A I wouldn't have. I don't even know, but I</p> <p>23 know I wouldn't have.</p> <p>24 Q Why?</p> <p>25 A Because I don't know if it would have been</p>
<p style="text-align: center;">Page 97</p>	<p style="text-align: center;">Page 99</p>

26 (Pages 101 to 104)

<p>1 corrupt politician category would be, right?</p> <p>2 A I'm not accusing every politician of being</p> <p>3 corrupt.</p> <p>4 Q I understand that. No. I understand.</p> <p>5 A So restate the question, please?</p> <p>6 Q Well, I'm just trying to understand what your</p> <p>7 understanding of what corrupt, corruption is in a</p> <p>8 politician, and so I just want --</p> <p>9 A Self-serving and maybe dishonest or just not</p> <p>10 good.</p> <p>11 Q Okay. In the last bullet point there on that</p> <p>12 third page of Exhibit 31 you state that if elected you</p> <p>13 will champion, quote, "anti-corruption measures." You</p> <p>14 see that?</p> <p>15 A (Nodding head)</p> <p>16 Q And then you list some examples; one of them</p> <p>17 is disclosures.</p> <p>18 A Yes.</p> <p>19 Q Disclosures of what?</p> <p>20 A Disclosures that they're taking campaign</p> <p>21 contribution or they're going to vote on something on</p> <p>22 the dais that actually will benefit their campaign</p> <p>23 contributors, for example.</p> <p>24 Q Okay. And you think that is a legitimate</p> <p>25 anti-corruption measure, right?</p>	<p>1 what -- what do you mean by anti-corruption measure?</p> <p>2 A More transparency.</p> <p>3 Q And that's it, transparency is the only --</p> <p>4 A That's not it, just it.</p> <p>5 Q Okay. What else?</p> <p>6 A It's part of it.</p> <p>7 Q This case is about an anti-corruption measure</p> <p>8 and is it good or not under the constitution. So it's</p> <p>9 a legitimate question to ask you: What do you</p> <p>10 understand an anti-corruption measure to be, a</p> <p>11 legitimate one? What is it?</p> <p>12 A A legitimate --</p> <p>13 Q Beyond, beyond transparency issues.</p> <p>14 A For example, contracts.</p> <p>15 Q Uh-huh.</p> <p>16 A They should be open for bid on a fair playing</p> <p>17 field without artificial or arbitrary boundaries of</p> <p>18 some sort.</p> <p>19 Q Okay. So this is not about any particular</p> <p>20 exhibit. You understand, I take it, that there has</p> <p>21 been a temporal restriction on campaign fundraising in</p> <p>22 Austin city elections since 1997, correct?</p> <p>23 A Correct.</p> <p>24 Q Okay. For the first 20 years or so it</p> <p>25 was -- it only allowed fundraising within 180 days of</p>
--	---

Page 105

Page 107

<p>1 A Yes.</p> <p>2 Q You mention lobbying prohibitions, and then</p> <p>3 you also mention eliminating favoritism. That's the</p> <p>4 phrase, "eliminating favoritism." What do you mean</p> <p>5 eliminating favoritism?</p> <p>6 A Well, I think that no-bid contracts or</p> <p>7 getting one bid for a contract could be a source of</p> <p>8 favoritism, just for example.</p> <p>9 Q Okay. And so why is it that you see -- for</p> <p>10 instance, your example on the disclosures limitation,</p> <p>11 disclosures about contributions from people who benefit</p> <p>12 from a vote of council, why is that an anti-corruption</p> <p>13 measure that you support, and a temporal restriction</p> <p>14 such as at issue here that you're challenging not one?</p> <p>15 What's the difference?</p> <p>16 A Okay. Can you repeat that?</p> <p>17 Q Probably not. What is the difference in</p> <p>18 terms of anti-corruption, battling anti-corruption --</p> <p>19 battling corruption, between a disclosure requirement</p> <p>20 for council member votes on items that benefit</p> <p>21 contributors and the temporal restriction you're</p> <p>22 challenging here?</p> <p>23 A I have no idea what that question means.</p> <p>24 Q Okay. I'm really trying to understand what</p> <p>25 you mean by anti-corruption measure. I guess that's</p>	<p>1 the election. Then after the Zimmerman case was</p> <p>2 decided at the district court level, the city council</p> <p>3 changed it and enacted the provision that you're</p> <p>4 challenging here, which set it for 365 days.</p> <p>5 So given that this has been in effect,</p> <p>6 this kind of -- there has been one in effect</p> <p>7 continuously for about 25 years, what is your</p> <p>8 understanding of how one would determine whether it is</p> <p>9 successfully fighting corruption or not?</p> <p>10 A Well, then, I would ask you how do you</p> <p>11 know that this temporal --</p> <p>12 Q No. Don't ask me back the question. I need</p> <p>13 to know your --</p> <p>14 A It's completely arbitrary. It's completely</p> <p>15 arbitrary, and it is an unfair advantage to a more</p> <p>16 politically connected candidate. When you shorten the</p> <p>17 window, any kind of arbitrary window, why is there a</p> <p>18 window at all?</p> <p>19 Q Okay. So your position is there should be no</p> <p>20 window?</p> <p>21 A Yes.</p> <p>22 Q Starting, starting, like, right now for the</p> <p>23 race in 2024, for instance?</p> <p>24 A I haven't given it that, I haven't given it</p> <p>25 that exact thought. In my mind I can see it being as</p>
---	--

Page 106

Page 108

27 (Pages 105 to 108)

1 soon as an election happens, then the window should
2 open for the next election.

3 Q Have you ever seen, to your understanding of
4 corruption as you've described it, any corruption in
5 Austin city elections, or the appearance of it, with
6 respect to the timing of fundraising?

7 A I have not.

8 Q Okay. And you started paying closer
9 attention in 2008, correct, as you testified at the
10 beginning? Is that right?

11 A Yes.

12 Q That's about 10 years after the temporal
13 restriction went into effect, right?

14 A Yes.

15 Q So why doesn't that suggest to you that it's
16 working in terms of preventing corruption?

17 A Because I am just now a second-time candidate
18 not paying attention to how fundraising works, and
19 until you have been involved and been a candidate and
20 understand how fundraising works for you and against
21 you, it's, it's not just the average person who's
22 watching politics can understand exactly what goes on.
23 They have no even idea about these reports you have to
24 file. There's a lot to learn.

25 Q Right. Okay. So this is the last set of

1 you that it hasn't happened, you haven't filed amended
2 disclosures to provide the relevant computation,
3 correct?

4 A Correct.

5 Q Okay. Now look at your first amended
6 complaint, which is Exhibit 22.

7 A Okay.

8 Q This was filed a little over a month after
9 the disclosures were submitted. All right. Look on
10 page --

11 A The, the affidavits? The disclosures?

12 Q The disclosures. Yeah.

13 A Okay.

14 Q Yeah. If you look, I don't remember the
15 exact date, but it's about a month and several days
16 later.

17 A Okay.

18 Q All right. So the first amended complaint,
19 Exhibit 22, look at page 17, paragraph 5 of the Prayer
20 for Relief.

21 A Okay.

22 Q There you ask for compensatory and nominal
23 damages, correct?

24 A Yes.

25 Q Okay. Now look at Exhibit 15, and look

Page 109

Page 111

1 questions I think I have. I reserve the right to think
2 for three seconds and see if there are more.
3 So I'm trying to figure out, and I'll
4 tell you where this is going, trying to figure out what
5 relief you're seeking from the city -- you are seeking
6 from the city, not Mr. Clark, just you. Okay? So
7 that's what these questions are going for. Let's look
8 at...

9 MR. NAJVAR: Would you mind if I
10 run to the restroom before you --

11 MR. HICKS: Not at all. We can
12 take a break.

13 (At 2:41 p.m. the proceedings
14 recessed, continuing at 2:51 p.m.)

15 Q (By Mr. Hicks) Okay. Looking at Exhibit 13,
16 those are your disclosures that we've talked about
17 before. Look at paragraph C. There you represent that
18 you anticipate you'll be filing an amended complaint
19 which might remove the claim for compensatory damages,
20 and if you don't, you'll amend the disclosures to
21 provide the relevant computation.

22 A I need to read that again. Okay?

23 Q Sure.

24 A Okay.

25 Q So to your knowledge, and I can represent to

1 at -- it's dated June 22, 2022, correct? It's a month,
2 a couple months after your first amended complaint was
3 filed, right?

4 A I don't know what the dates are. Sorry.
5 Q You can look at the back. Go to the back,
6 you can see the date it was served, Certificate of
7 Service there.

8 A Okay. Okay. Got you.

9 Q Okay. So look at your responses to numbers 8
10 and 9, Interrogatories No. 8 and 9. Let me find it for
11 you, make it go faster.

12 A Okay.

13 Q Look at the last sentence of each of those
14 two responses. Do you see that?

15 A Yes.

16 Q Okay. And you verified these, and so you're
17 swearing that you aren't seeking compensatory damages
18 in either your personal or candidate capacity, right?

19 A Yes.

20 Q That's what it says. Okay. Now look at
21 Exhibit 7 filed September 12th --

22 A Yes.

23 Q -- 2022, which is just two and a half months
24 or so after those responses we just talked about,
25 right?

Page 110

Page 112

28 (Pages 109 to 112)

<p>1 A Okay.</p> <p>2 Q Look at page 19, paragraph 5.</p> <p>3 A Okay.</p> <p>4 Q There it says "Plaintiffs," and it doesn't have an apostrophe in it, "constitutional rights." It refers to those, it says compensatory damages are claimed for them, right?</p> <p>8 A Yes.</p> <p>9 Q So do you know whether that reference includes you or not?</p> <p>11 A I do not know for sure.</p> <p>12 Q Okay. So the upshot of this is, are you seeking compensatory damages from the city or not?</p> <p>14 MR. NAJVAR: And Jennifer, you can answer to the extent you know the answer. If it's something you don't know, then you can just say whatever your answer is or your thought is. I would object to it to the extent it calls for a legal conclusion.</p> <p>20 MR. HICKS: It's not asking for a legal conclusion. She knows whether she's asking for compensatory damages or not.</p> <p>23 MR. NAJVAR: Well, I know, but there's nominal damages are also --</p> <p>25 MR. HICKS: I'm only asking about</p>	<p>1 question. She knows whether she wants --</p> <p>2 MR. NAJVAR: It is.</p> <p>3 MR. HICKS: -- compensatory damages</p> <p>4 or not.</p> <p>5 MR. NAJVAR: Compensatory damages</p> <p>6 is a term of art. It can mean a lot of things.</p> <p>7 MR. HICKS: Well, can you give me</p> <p>8 an answer or not?</p> <p>9 MR. NAJVAR: You can rely on the</p> <p>10 answer that's in the interrogatory responses, and if</p> <p>11 you need further --</p> <p>12 MR. HICKS: Okay. No, no, no.</p> <p>13 That's fine. If that's -- that's good. I mean, I'm</p> <p>14 not opposed to it, but the problem is that you filed</p> <p>15 your second amended complaint after those interrogatory</p> <p>16 responses, and it is ambiguous what you're seeking on</p> <p>17 behalf of Ms. Virden against the city with respect to</p> <p>18 compensatory damages.</p> <p>19 So may I say it back to you? Let me see</p> <p>20 Exhibit -- hold on, because if we can get this cleared,</p> <p>21 that's great -- Exhibit 15. Thank you. Okay.</p> <p>22 Exhibit 15 is your supplemental responses to</p> <p>23 defendant's first set of interrogatories, and in your</p> <p>24 response to Interrogatory No. 8 you say, "Virden does</p> <p>25 not seek any monetary damages in her personal capacity</p>
<p style="text-align: center;">Page 113</p>	<p style="text-align: center;">Page 115</p>

<p>1 MR. HICKS: Yeah. Okay. That 2 helps.</p> <p>3 A Do I need to put that back in this pile?</p> <p>4 MR. HICKS: Oh, I need to give that 5 back to you, and I pass the witness.</p> <p>6 EXAMINATION</p> <p>7 BY MR. NAJVAR:</p> <p>8 Q Okay. Ms. Virden, I'm just going to have a 9 few follow-up questions. First I want to talk about 10 the \$300,000 loan that you gave the campaign. We 11 talked earlier, and I think the C&E reports show that 12 you made that loan in December of 2021; is that right?</p> <p>13 A I think so. Sounds right.</p> <p>14 Q So, you know, early in the case you were 15 trying -- I mean, the fundraising window now has been 16 open since November of 2021, but you filed the case in 17 order to try to get the fundraising window lifted, 18 right?</p> <p>19 A Yes.</p> <p>20 Q Why -- well, let me just ask you, why did you 21 not make that \$300,000 loan to your campaign earlier 22 when the fundraising window was closed?</p> <p>23 A When the fundraising -- well, I wouldn't have 24 done it when the fundraising window is closed, because 25 I wouldn't have known whether or not that was legal.</p>	<p>1 think I heard you say, is it fair to characterize -- or 2 I'm trying to drill down to sort of one of the points 3 you made. Are you saying that you sort of reluctantly 4 made the loan? Like, that is to say, you're more 5 likely to make the loan earlier if you can gauge your 6 potential support and, and your ability to repay the 7 loan?</p> <p>8 A Yes. I could have been able to tell sooner 9 if the donations -- like, if I could have been able to 10 take donations and judge the pace of donations better, 11 had a longer-term period to do that. But another thing 12 about -- I don't, I don't really want to make my -- I 13 don't really want to make a \$300,000 loan and actually 14 spend my own money on my campaign. That is something I 15 did as a strategic move for my opponents to see that I 16 had \$300,000 to spend if I wanted to. It was, it was a 17 strategic move, because I'm not likely to spend money 18 that I don't think I can get repaid with donations.</p> <p>19 Q Okay. And you were testifying earlier too 20 about, you know, getting your contributors to, I think 21 you, you called it -- well, I don't know if you used 22 this term or it's in my mind, but your contributors 23 when they make contributions, how does that benefit 24 your campaign, other than the money that's being sent 25 to the campaign?</p>
<p style="text-align: center;">Page 117</p> <p>1 So I wouldn't have done that without asking someone 2 first, and I just didn't. But the other -- let's see. 3 That's the answer to that question I guess.</p> <p>4 Q Well, is there any difference between, 5 like -- as far as your campaign goes, running your 6 campaign, is there any difference between money that 7 you yourself put into your campaign versus money that 8 comes from your supporters?</p> <p>9 A Yes. It's very different. The, the money 10 that -- so donations are money that I really want to 11 use to spend on the campaign and further the message 12 and be the figurehead for the whole political movement. 13 I'm very much less enthused about spending my own money 14 on a campaign, and if I'm not able to determine whether 15 or not the donations are going to come in the way I 16 need them to come in, in order to repay the loan to my 17 campaign, then I'm much more -- much less likely to use 18 the loan money. But another thing also about the 19 \$300,000 is -- well, I'll stop there.</p> <p>20 Q Okay.</p> <p>21 A Does that answer your question?</p> <p>22 Q Yes. And I may follow up a little bit. Just 23 one second while I check the dates on this report 24 again.</p> <p>25 I mean, is it, is it -- one thing I</p>	<p style="text-align: center;">Page 119</p> <p>1 A It feeds on itself on a campaign. When 2 other potential politically active people in Austin 3 see that somebody else is making campaign contributions 4 to a campaign, it demonstrates viability. It 5 demonstrates -- as a candidate. And it also just tends 6 to generate more and more interest. It just feeds on 7 itself.</p> <p>8 Q Okay. And we can go back to -- let's see. 9 If I can get these campaign reports in the right order 10 here, I'm going to go back to the \$50,000 loan issue 11 that we were talking about earlier. So I have 12 reports -- I'm going to go back through, I believe it's 13 going to be Exhibits 24, 23, and 25, and Exhibit 24 14 actually sequentially or chronologically is first. 15 That covers the period from July 1st, 2020 through 16 September 24th, 2020?</p> <p>17 A Mm-hm.</p> <p>18 Q I'll just give you a moment to find it.</p> <p>19 A Yeah. I can just put them in order. Okay.</p> <p>20 Q Okay. So if we look at Exhibits 24, 23, and 21 25, 24 covers July 1st, 2020 through September 24th, 22 2020, right?</p> <p>23 A Mm-hm.</p> <p>24 Q And then Exhibit 23 covers -- this is a 25 corrected report that covers September 25th, 2020</p>
<p>Page 118</p>	<p>Page 120</p>

30 (Pages 117 to 120)

<p>1 through October 24th, 2020 --</p> <p>2 A Yes.</p> <p>3 Q -- right? And then Exhibit 25 covers -- that</p> <p>4 starts on December 6th, 2020, right? If you look at</p> <p>5 the period covered in box 9?</p> <p>6 A Oh, gosh. Yes.</p> <p>7 Q Okay. So because there was some discussion</p> <p>8 earlier. We were trying to find where this loan or</p> <p>9 when this \$50,000 was repaid to yourself?</p> <p>10 A Yes.</p> <p>11 Q Did you file a runoff report in between</p> <p>12 there? In between Exhibits 23 and 25 was there another</p> <p>13 report that you filed?</p> <p>14 A Hold on. So this is through, this is through</p> <p>15 the 31st. So that would be -- that includes the</p> <p>16 runoff, right?</p> <p>17 Q Well, if we look at --</p> <p>18 A Is there another report? I can't remember.</p> <p>19 Q If we look at Exhibit 23, that ends on</p> <p>20 October 24th, 2020. The period covered --</p> <p>21 A Yes.</p> <p>22 Q -- that ends on October 24th.</p> <p>23 A Right.</p> <p>24 Q And then the next report we have, Exhibit 25,</p> <p>25 doesn't begin until December 6, 2020.</p>	<p>1 much as you want about whatever policy being debated is</p> <p>2 on the dais at a particular time, point in time, let's</p> <p>3 just -- let's say the city was, you know, influenced by</p> <p>4 the debate that you're involved in to go the way you</p> <p>5 suggest they go. Do you think that would have an</p> <p>6 effect on your campaign itself?</p> <p>7 A Yeah. It would have a positive effect on my</p> <p>8 campaign if I'm able to affect the direction that the,</p> <p>9 that the council takes, if I'm able to influence it to</p> <p>10 go more in the direction that I'm in favor of. Yes. I</p> <p>11 think that would be a benefit to the campaign, my</p> <p>12 campaign.</p> <p>13 Q Well, why? Can you elaborate a little bit?</p> <p>14 Why?</p> <p>15 A Well, I think if it's something that I</p> <p>16 support and my, my campaign supporters are in favor of</p> <p>17 as well, that'll demonstrate my ability to influence</p> <p>18 the dais as a whole, especially the mayor, to have a</p> <p>19 positive influence as far as my campaign is concerned</p> <p>20 on the policies being made at council.</p> <p>21 Q Okay. And last question, Mr. Hicks was</p> <p>22 pointing out earlier that when you testified that you</p> <p>23 wanted the window to open sooner, he, he pointed out</p> <p>24 that that would also allow -- it would apply to</p> <p>25 everybody. So it would allow even the establishment</p>
<p style="text-align: center;">Page 121</p>	<p style="text-align: center;">Page 123</p>

1 harder for somebody who's not tied into the
 2 establishment donor list to get a fundraising list up
 3 and running, you know, a fundraising --
 4 A Most definitely.
 5 Q Why is it harder?
 6 A Well, it's harder because I'm not a -- like
 7 for me, I'm not a -- I'm not in the political
 8 establishment. I don't have everybody's email address
 9 and everybody's phone number. They have an established
 10 group of people, mostly good old boys, that stick
 11 together and like to direct how politics go in Austin.
 12 Q Well, so not having access to that list
 13 yourself, how do you, how do you go about generating a
 14 list to use? How do you go about building a
 15 fundraising operation?
 16 A Through the website is a lot of it, and we
 17 look back at old -- well, email addresses are hard to
 18 get, but we look at other candidates' filings to get I
 19 guess PACs and things like that, look at donors, find
 20 out who donated to what PACs. And we can do snail mail
 21 to them.
 22 Q Well --
 23 A Email -- emails are not easy to get.
 24 Q Do your, do your own campaign communications
 25 when you're out talking about issues, does that tie --

Page 125

1 contribution, or do they give you a smaller amount?
 2 A It can vary. It's smaller typically.
 3 Q So if somebody gives you a smaller amount,
 4 does your campaign follow up with them after that
 5 to -- you know, for another, another contribution?
 6 A Yes, we do. We try to encourage people and
 7 follow up, especially, like, via Constant Contact.
 8 We'll say things, If you haven't already maxed out,
 9 please consider doing so.
 10 Q Okay. But I would, I would imagine normally,
 11 like, those kind of follow-ups, they, like -- well, how
 12 long after the initial contribution from, let's say
 13 Individual A, how long after they give their first
 14 contribution would you, you know, engage them again and
 15 ask for a follow-up contribution if they haven't maxed
 16 out? Is it immediate, or is it --
 17 A Well, no, it's not immediate. Actually it
 18 tends to be more right before our filing deadline for
 19 one of these reports.
 20 Q Okay.
 21 A That's when -- it's a lot easier to get
 22 people to actually go to the computer and make the
 23 contribution that they know you're trying to meet a
 24 filing deadline, to have the best report you can before
 25 the filing deadline.

Page 127

1 how, how does that relate to your fundraising success?
 2 A Say that again?
 3 Q Like, you're -- when you're out communicating
 4 about issues that are currently on the dais and maybe
 5 controversial, if Jennifer Virden's out there talking
 6 about those things, how does that affect or how does
 7 that relate to your fundraising capabilities?
 8 A I think that I'm speaking about issues that
 9 people care about, which is my platform really,
 10 everything that people care about. If they hear what
 11 I'm speaking about, then they're more likely to donate
 12 to it. I mean, it's just -- I'm not exactly sure what
 13 the question is, but --
 14 Q Well, when somebody -- let me ask you this.
 15 When somebody gives to your campaign do you, do you,
 16 like, retain that information so that --
 17 A Oh. No. Okay. I get it. Yes. If somebody
 18 makes a contribution, yes. Then you can, you can ask
 19 for their contact information and you can build your
 20 email list that way.
 21 Q Okay. So you build an email list, like,
 22 cumulatively over the campaign?
 23 A Yes.
 24 Q Okay. So, and do most of your individual
 25 contributors, do they max out with their first

Page 126

1 Q Well, can, can debates on issues of interest
 2 to the public serve as that kind of a, you know,
 3 motivator also?
 4 A Yes. If it's a hot issue, yes.
 5 Q Okay.
 6 A If it's top of mind, like homeless, police
 7 staffing, property taxes.
 8 THE REPORTER: Police what? I'm
 9 sorry?
 10 THE WITNESS: Police staffing,
 11 property taxes.
 12 Q Okay. I believe that's all I have.
 13 THE WITNESS: Be sure you get my
 14 platform on the record.
 15 Q Oh, on -- so you said earlier, I think you
 16 agreed with Mr. Hicks that to have, like, your campaign
 17 Facebook account, you don't have to pay Facebook to
 18 have that account itself, right?
 19 A Correct.
 20 Q But are there things you can do on Facebook
 21 that do cost money?
 22 A Yes. We boost and advertise, and that costs
 23 a lot.
 24 Q Is Twitter the same way?
 25 A I don't think Twitter allows political

Page 128

32 (Pages 125 to 128)

<p>1 listing.</p> <p>2 Q Okay. And have you ever considered -- you</p> <p>3 talked about the radio, and the record shows you did</p> <p>4 some radio ads back in May of 2021 about the prop</p> <p>5 elections at the time.</p> <p>6 But if you had more money available at</p> <p>7 the time early in a cycle like that, would you consider</p> <p>8 doing, like, you know, other types of communications</p> <p>9 that may cost more?</p> <p>10 A Other types other than radio?</p> <p>11 Q Like, you know, I don't know, the different</p> <p>12 kind of things campaigns can do, like mail pieces?</p> <p>13 A Yeah. Yeah. USPS mailers. Yes. Most</p> <p>14 definitely.</p> <p>15 Q Why didn't you --</p> <p>16 A And to go citywide just to, just to target a</p> <p>17 few precincts is \$32,000 per mailer. That adds up</p> <p>18 really quickly.</p> <p>19 Q To send one mailer to --</p> <p>20 A Not even citywide, just, that was just a</p> <p>21 targeted, just one mailer. Yeah. Yeah. We definitely</p> <p>22 would do USPS mailers for sure.</p> <p>23 Q Okay.</p> <p>24 A We'd do TV, which, you know, that would be</p> <p>25 great. I'd do a ton more radio.</p>	<p>1 right?</p> <p>2 A Yes.</p> <p>3 Q Okay. So at that point, though, if there</p> <p>4 weren't a fundraising window, the dynamic of when you</p> <p>5 say you were running would change too, wouldn't it?</p> <p>6 A Possibly.</p> <p>7 Q So you're saying that before people know</p> <p>8 who's running for mayor you have a chance of raising</p> <p>9 money, and when you're running for mayor if the</p> <p>10 window's open and everybody says, I don't care, I'm</p> <p>11 going to act like there's no such thing -- that the</p> <p>12 window really doesn't open until later?</p> <p>13 A I don't understand the question.</p> <p>14 Q Okay. As I understood your testimony about</p> <p>15 this, the reason you thought you would benefit is</p> <p>16 because people wouldn't know that somebody they really</p> <p>17 support and want to give money to is going to be</p> <p>18 running later and you'll get it instead.</p> <p>19 A Yes. Because they love me.</p> <p>20 Q Yeah. Even though they --</p> <p>21 A And they would have wanted, and they would</p> <p>22 have wanted to give me money right then, because they</p> <p>23 were super excited.</p> <p>24 Q But if they had known Kirk Watson was</p> <p>25 running, they wouldn't have given it to you, right?</p>
Page 129	Page 131

34 (Pages 133 to 136)

GIVENS COURT REPORTING
6549 Fair Valley Trail, Austin, Texas 78749 (512) 301-7088 sgivens@austin.rr.com

1 Certified to by me this 26th day of September
2 2022.

3

GIVENS COURT REPORTING

6549 Fair Valley Trail

Austin, Texas 78749

(512) 301-7088



7

8 SANDRA S. GIVENS, CSR

Certification No. 5000

9 # sg-1967 Certificate Expires 1/31/24

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

Page 137

A	125:17	107:25	114:5,11 115:8 allows 22:6 128:25 alphabetical 90:24,25 altruistic 104:24 ambiguous 115:16 Admissions 3:16 ads 38:3,6 45:12 45:18 129:4 advance 65:18 advantage 18:22 68:25 108:15 advantages 18:21 advertise 128:22 advertisement 39:25 40:3 advertisements 34:18 41:7 affect 54:22 56:9 56:19,20 123:8 126:6 Affidavit 5:9,11 5:16 affidavits 111:11 afford 48:12 aggregate 14:21 14:22 ago 60:13 130:18 agree 41:11 agreed 96:25 128:16 ahead 25:7 75:19 94:7 96:1 aim 61:8 allegation 65:6,8 65:21 allegations 116:6 allow 123:24,25 124:5 allowed 46:24	51:23 53:7 art 115:6 artificial 107:17 aside 24:18 33:10 100:11 asked 56:12 59:14 86:6 89:13 asking 19:16,18 32:13,19 43:17 53:11 56:19 65:10 82:16 anybody 8:22 89:19 91:18 30:8 32:13,24 93:13 113:20 113:21,25 anyone's 56:17 anyway 41:19 58:5 62:24 72:22 80:2 100:6,12 apostrophe 113:5 appear 8:7 appearance 51:21,21 109:5 Appearances 3:3 appears 8:10 22:18 77:25 application 3:22 4:12 17:11 28:19,22 46:5 applications 46:1 apply 50:23 68:14 123:24 appointment 3:25 4:8,10 17:13 27:5 April 41:3,6 65:21,22 103:2 arbitrary 107:17 108:14 108:15,17 area 15:1,3 arranged 90:25 arrangement	51:23 53:7 art 115:6 artificial 107:17 aside 24:18 33:10 100:11 asked 56:12 59:14 86:6 89:13 asking 19:16,18 32:13,19 43:17 53:11 56:19 65:10 82:16 anybody 8:22 89:19 91:18 30:8 32:13,24 93:13 113:20 113:21,25 anyone's 56:17 anyway 41:19 58:5 62:24 72:22 80:2 100:6,12 apostrophe 113:5 appear 8:7 appearance 51:21,21 109:5 Appearances 3:3 appears 8:10 22:18 77:25 application 3:22 4:12 17:11 28:19,22 46:5 applications 46:1 apply 50:23 68:14 123:24 appointment 3:25 4:8,10 17:13 27:5 April 41:3,6 65:21,22 103:2 arbitrary 107:17 108:14 108:15,17 area 15:1,3 arranged 90:25 arrangement
ability 51:9 119:6 122:25 123:17 able 17:15 37:25 41:22 43:9 44:5,14 45:2 46:9,14,17,21 47:6 48:12 50:25 52:20 57:5 65:13,14 66:23 67:12 68:5,22 70:4,8 99:21 118:14 119:8,9 123:8 123:9 130:7 accept 20:22 26:17 65:17 access 36:18 37:19,21,25 125:12 account 37:12 37:14,17,19 45:14 87:6 128:17,18 accusing 105:2 ACKNOWLEDGEMENT 134:1 act 131:11 action 1:5 39:16 40:6 135:5 136:22,24 active 11:22 120:2 actively 12:24 88:15 activity 74:18 actual 7:10 add 31:14,17 added 32:13,25 64:11,23 adding 64:24 addition 65:12 additional 48:16 address 11:12 125:8 addresses	125:17 addressing 25:7 adds 23:2 129:17 adjourned 132:20 Adjustment 3:19 Admissions 3:16 ads 38:3,6 45:12 45:18 129:4 advance 65:18 advantage 18:22 68:25 108:15 advantages 18:21 advertise 128:22 advertisement 39:25 40:3 advertisements 34:18 41:7 affect 54:22 56:9 56:19,20 123:8 126:6 Affidavit 5:9,11 5:16 affidavits 111:11 afford 48:12 aggregate 14:21 14:22 ago 60:13 130:18 agree 41:11 agreed 96:25 128:16 ahead 25:7 75:19 94:7 96:1 aim 61:8 allegation 65:6,8 65:21 allegations 116:6 allow 123:24,25 124:5 allowed 46:24	107:25 allows 22:6 128:25 alphabetical 90:24,25 altruistic 104:24 ambiguous 115:16 Admissions 3:16 ads 38:3,6 45:12 45:18 129:4 advance 65:18 advantage 18:22 68:25 108:15 advantages 18:21 advertise 128:22 advertisement 39:25 40:3 advertisements 34:18 41:7 affect 54:22 56:9 56:19,20 123:8 126:6 Affidavit 5:9,11 5:16 affidavits 111:11 afford 48:12 aggregate 14:21 14:22 ago 60:13 130:18 agree 41:11 agreed 96:25 128:16 ahead 25:7 75:19 94:7 96:1 aim 61:8 allegation 65:6,8 65:21 allegations 116:6 allow 123:24,25 124:5 allowed 46:24	114:5,11 115:8 115:10 118:3 118:21 132:11 answer's 49:11 answers 134:5 anti-corruption 105:13,25 106:12,18,18 106:25 107:1,7 107:10 anticipate 110:18 130:5 110:18 111:1,5 anybody 8:22 30:8 32:13,24 93:13 113:20 113:21,25 anyone's 56:17 anyway 41:19 58:5 62:24 72:22 80:2 100:6,12 apostrophe 113:5 appear 8:7 appearance 51:21,21 109:5 Appearances 3:3 appears 8:10 22:18 77:25 application 3:22 4:12 17:11 28:19,22 46:5 applications 46:1 apply 50:23 68:14 123:24 appointment 3:25 4:8,10 17:13 27:5 April 41:3,6 65:21,22 103:2 arbitrary 107:17 108:14 108:15,17 area 15:1,3 arranged 90:25 arrangement	51:23 53:7 art 115:6 artificial 107:17 aside 24:18 33:10 100:11 asked 56:12 59:14 86:6 89:13 asking 19:16,18 32:13,19 43:17 53:11 56:19 65:10 82:16 anybody 8:22 89:19 91:18 30:8 32:13,24 93:13 113:20 113:21,25 anyone's 56:17 anyway 41:19 58:5 62:24 72:22 80:2 100:6,12 apostrophe 113:5 appear 8:7 appearance 51:21,21 109:5 Appearances 3:3 appears 8:10 22:18 77:25 application 3:22 4:12 17:11 28:19,22 46:5 applications 46:1 apply 50:23 68:14 123:24 appointment 3:25 4:8,10 17:13 27:5 April 41:3,6 65:21,22 103:2 arbitrary 107:17 108:14 108:15,17 area 15:1,3 arranged 90:25 arrangement	

August 15:20 17:15,16 18:14 28:25 80:23	102:22 108:12 112:5,5 114:16 115:19 117:3,5	beyond 61:17 62:7 107:13,13 bid 106:7 107:16	building 47:22 125:14 bullet 105:11	78:24 82:18 84:3,8 85:4 86:19 89:23
Austin 1:2,6,21 1:22 2:10 3:22 3:23 4:5 5:4 6:8 8:15 9:5,8 9:25 10:16,16 11:14,23 13:13 17:12 27:15 28:12 40:12,13 40:15 41:18 42:2 47:10,11 48:15,19 49:2 49:8 50:10 54:4,7 55:8 65:16 66:25 68:8,8,20 107:22 109:5 116:14 120:2 122:24 125:11 135:2,6 136:8 137:4	120:8,10,12 125:17 129:4 130:13 balance 77:12 77:19 78:11 99:1 ballot 3:20,23 4:12 15:25 16:11 17:12 28:19 ban 12:8 based 96:24 basic 15:8 basically 58:25 65:13 69:21 basis 43:24 bat 132:7 battling 106:18 106:19 beginning 75:8 109:10 begins 23:11 behalf 115:17 believe 8:19 9:1 10:20 13:6 15:13,13 44:12 46:2 55:15 59:11 60:3,8 62:19 75:24 77:15 80:1 81:10 86:24 93:3 101:7 120:12 128:12	bigger 69:11 bill 67:4 bills 25:10 bit 118:22 123:13 blackout 21:5 21:14 blank 59:2,4 blast 35:8 blasted 78:19 blasts 35:16 books 73:24 boost 128:22 bottom 34:5,6 39:5 boundaries 107:17 box 2:10 71:11 72:3,9,24 75:25 85:8,9 85:10 86:7 96:3 99:6 101:25 121:5 boxes 97:14 102:14 boy's 50:17 boys 125:10 brand-new 18:8 break 61:8 62:16 64:3 110:12 breaking 61:14 briefly 28:17 broadcast 41:23 broader 13:14 broadly 11:22 54:15 budget 42:20 68:2 budgeted 98:10 budgeting 98:10 better 19:1 36:21 64:1 119:10	C C 2:1 26:3 33:9 110:17 C&E 26:3,5,6 117:11 C&Es 26:1,9 call 20:19 21:14 24:6 31:10,11 63:24 68:16 called 14:21 104:7 119:21 calling 7:19 69:20 calls 10:8 31:23 32:16 39:21 62:10,11 88:24 93:9 99:3 113:18 campaign 3:19 3:25 4:6,8,10 5:13,18,20,22 17:13,23 21:23 22:7 23:10 24:15,20 25:2 25:15,21 27:6 27:12 28:5 34:11 35:15 36:10,13 37:15 37:16,17,19 38:23 40:5,7 40:10,14 42:20 43:14,25 46:14 47:12,22 48:11 49:13,18,20 52:20 55:2 56:14,21 57:7 59:19 60:24 61:4,6 62:8 63:9,11 65:8 65:15 66:1 70:24 71:13,25 73:7,16,16,20 73:20,25 74:7 74:18,18 77:7	90:3 91:20 93:5,12 95:10 95:16,19 96:4 97:6 98:13,17 103:19 104:13 105:20,22 107:21 117:10 117:21 118:5,6 118:7,11,14,17 119:14,24,25 120:1,3,4,9 122:19,25,25 123:6,8,11,12 123:16,19 125:24 126:15 126:22 127:4 128:16 campaigning 11:1 49:14,15 49:17 56:5 campaigns 129:12 camping 12:8 campus 13:7 candidacy 11:2 candidate 4:8,10 8:18,23 9:21 9:25 10:5,15 10:19 17:25 18:8,19 20:21 24:7,10 27:6 46:20 47:4,24 48:3,14,24 49:4,5,6 50:12 50:15,17 53:16 65:14 66:22 67:23 69:13,14 108:16 109:17 109:19 112:18 116:3,18 120:5 Candidate/ 5:9 5:11,16 Candidate/Of...
B B 3:11 23:2 26:22 33:3,4,5 back 12:7,11 13:17,22,24,25 18:18 19:23,25 21:9 24:15 26:21 33:9 47:20 50:4 57:2 58:19 73:24 74:22,23 75:2 76:2,9 82:14 83:24 86:1 87:2 91:17 93:21 96:8 97:14				

5:13,18,20,22 candidates 3:18 22:6 30:6 52:13 65:16,17 66:10,13,23 67:24 69:19,21 124:6 candidates' 125:18 canvass 26:15 cap 14:21 capabilities 126:7 capacity 112:18 115:25 116:3 116:16,18 Capital 94:11 caps 15:4 card 92:18,18 93:19 care 126:9,10 131:10 careful 98:8 Cari 63:10,10,15 CariMarshall... 5:6 63:7 case 6:13,25 8:8 31:5,14,19 33:15 47:14 48:4,7 58:1 91:15,19 95:20 107:7 108:1 117:14,16 124:3 category 93:24 105:1 cause 1:17 causes 52:2 cell 96:22 certain 55:17,24 certificate 112:6 135:22 137:9 Certification 3:9 135:9 137:8 Certified 135:13 137:1 certify 134:3	135:14,25 136:20 challenge 20:19 20:21 21:13,19 21:22 challengers 52:6 69:14 124:5 challenging 22:16 24:6 26:22 48:14 49:6 106:14,22 108:4 champion 105:13 chance 131:8 change 28:7 40:20 53:14 131:5 133:5 changed 19:4 27:11,15,22,25 84:5 108:3 changes 3:8 8:12 33:5,24 40:21 133:1 134:7,8 136:4,5 chapter 13:6 characterize 11:22 119:1 characterizes 39:18 charges 136:7 charter 4:5 20:16 21:20,23 24:5 cheap 98:17 check 23:25 118:23 checked 103:22 checks 25:17 chest 47:23 67:25 choose 37:6 52:13 chosen 29:22 48:3 49:3 50:14 chronologically	120:14 church 88:13 circle 30:14 citizen 68:8 city 1:6,21 3:18 3:18,22,23 4:5 4:7,12 6:13 8:15 9:25 10:23 13:13 14:13 15:12 16:15 17:12 18:5 20:14,15 20:15,21 21:19 21:22 22:7,15 23:2,21 24:5 26:15 27:15 28:20 40:12,15 41:8 47:9,10 48:15 54:22 55:1,9,12,22 56:2,4,13,17 57:4 66:4 107:22 108:2 109:5 110:5,6 113:13 115:17 116:14,17,19 123:3 135:6 136:8 city's 3:16 33:14 citywide 9:6 129:16,20 Civil 1:5,23 135:5 claim 20:14 21:13 110:19 claimed 113:7 claims 65:13 clarification 114:21 clarified 114:15 clarify 51:18 clarity 45:1 78:21 83:1 Clark 31:4 58:11 60:17,17 60:20 64:11 79:19 80:21,23	81:16 83:13 100:22 103:5 110:6 clear 7:4 60:7 86:4,22 cleared 115:20 clearer 57:2 Clerk 3:18 4:7 clerk's 14:13 click 103:24 closed 41:22 86:12 117:22 117:24 130:19 closely 58:22 closer 109:8 closing 73:24 club 13:12 50:8 50:18 clubs 13:1,11 co-plaintiff 64:12 code 20:15 23:2 68:12 codes 15:1 Cody 59:12 60:4 60:8 coffers 98:3 com- 47:16 come 13:25 17:19 33:9 44:20 63:4 Civil 1:5,23 66:7 118:15,16 comes 118:8 coming 40:12 46:18 commentary 9:24 committed 30:19 communicating 126:3 communication 39:18,19 communicatio... 34:11,22 36:7 36:11 37:10 38:19 58:21	83:24 125:24 129:8 compare 103:11 comparison 97:22 compensatory 110:19 111:22 112:17 113:6 113:13,22 114:1,6 115:3 115:5,18 compete 47:23 complaint 4:2 5:7 20:7 64:9 64:17,24 65:7 110:18 111:6 111:18 112:2 115:15 116:6 complete 96:22 completely 47:8 47:16 48:25,25 56:5,9,15 108:14,14 computation 110:21 111:2 computer 127:22 con- 85:14 86:15 concern 68:24 concerned 123:19 concerns 14:24 concluded 24:23 conclusion 10:8 31:23 32:8 39:21 88:25 93:9 99:3 113:19,21 conducting 57:7 confident 58:22 confirm 27:4 confused 77:19 82:12 114:3 confusing 83:3 connected 108:16 connection
--	--	---	--	--

59:19 85:5	48:4,13 62:8	102:24 105:23	109:9 111:3,4	course 116:21
91:15	62:12 66:23	106:21 119:20	111:23 112:1	court 1:1 7:13
consider 17:18	67:12 81:17	119:22 126:25	116:20 128:19	14:5 39:16
17:24 18:19	83:22 84:8	controversial	134:4	108:2 135:1
19:22 39:19	88:14	126:5	corrected 70:23	137:3
40:2 52:17,18	contributed	conversations	120:25	cover 27:3 82:17
52:18,19 91:18	69:5 103:8	92:3	correction 78:2	coverage 12:20
127:9 129:7	contributing	convoluted	78:4	covered 79:15
considered 8:17	67:24 83:12	99:16	Correction/A...	80:14 88:18
40:11 129:2	contribution	coordinator	5:9,11,16	121:5,20
Constant 8:25	14:11,16,18	61:2	corrections	covering 85:14
34:24 35:7,22	67:3 80:14,23	copied 24:4	134:7	covers 120:15
35:24 39:13	81:1 84:17	copies 7:20	corrupt 53:7,8	120:21,24,25
127:7	87:16,21,22	136:9	53:13,15	121:3
constitution	88:10,13,17	copy 14:1,2	104:18,22	create 36:10
107:8	89:22 98:22	70:20,22 72:8	105:1,3,7	created 37:15
constitutional	99:1,12 105:21	135:22	corruption	credit 92:18,18
113:5	126:18 127:1,5	correct 11:10	48:23 49:1	93:19
consult 100:2	127:12,14,15	13:18 14:20	51:20,21 52:2	crossed 89:21
114:12	127:23	15:12,18,25	52:4,5,7,17,24	crosstalk 76:14
consultant 98:6	contributions	16:4,20,20	53:3 105:7	82:21
contact 9:1	4:6 14:25	17:16 20:17	106:19 108:9	CSR 1:19 137:8
34:24 35:7,23	20:22 25:24	22:17,20,23	109:4,4,16	cumulatively
35:24 39:13	26:7,18 40:7	23:6 27:10,13	cost 35:19,20,24	126:22
61:18 126:19	40:15 42:8	27:14 28:4,8	35:25 36:14	current 41:18
127:7	46:22,25 48:11	29:1 34:25	37:11 38:5	currently 126:4
contacted 62:2,2	49:5,9 50:20	37:4 41:13,24	43:5 124:21	cycle 68:2 129:7
62:4,5	65:8,16 66:2	45:17 51:11,11	128:21 129:9	132:9
contains 136:5	66:20 74:24	51:12 52:2	costs 38:19	cycle's 46:23
continue 46:22	75:2 78:24	53:3 54:17,18	116:22 128:22	47:17
46:25 47:22	79:14,15,24	56:23 59:6	council 3:18,23	<hr/> D
continuing 64:5	80:20 81:22	60:24 65:23	8:15 10:23	D 3:1
110:14 122:15	83:11 84:3	66:1 67:5,6,9	15:24 16:15,23	dais 40:13 47:11
continuously	85:13,14,15	68:6 70:25	18:5 22:25	105:22 123:2
10:1,16 11:1,7	86:10,16,17	71:3,5,17 72:1	26:23 27:15,17	123:18 126:4
108:7	87:8,18 88:5,7	72:25 73:1,8,9	27:18,24 28:11	damages 110:19
contract 2:13	88:9,15,20,22	76:4,7 78:3,9	55:9,12,15,22	111:23 112:17
106:7	89:12,20,20	85:6,14,20	56:17 106:12	113:6,13,22,24
contracts 106:6	92:16 93:5	87:12,18,19	106:20 108:2	114:7,9,18,19
107:14	94:15,16 97:19	88:2 92:16,17	123:9,20	115:3,5,18,25
contradiction	97:23 101:5	93:7 95:17	council's 56:2,4	116:1,2,3,15
47:9 48:25	102:15 106:11	96:5,6,15,19	counsel 136:16	116:16,18,19
51:23 52:1	119:23 120:3	97:4,4,8,9,20	136:20	date 8:9 15:14
53:5	130:6,10	99:14 101:10	count 90:16	18:3 23:11
contradictory	contributors	101:15,16	counted 93:20	31:6,7 43:19
55:8	68:15 70:9	102:2,7,16	couple 38:1 48:4	65:18 73:10,11
contribute 47:1	82:21 100:21	107:22,23	48:5,13 112:2	73:12,13,14

74:14,16 86:21 88:14 94:4,10 96:17 111:15 112:6 114:8 134:15 136:3 dated 46:3 71:2 76:3 102:1 112:1 dates 76:9 77:2 112:4 118:23 Davis 58:10 59:12 60:9 day 1:18 13:16 13:17 20:23 23:11 30:1,1 83:16 100:24 101:1 137:1 days 29:19 97:1 97:5 107:25 108:4 111:15 136:3 deadline 127:18 127:24,25 debate 123:4 debated 123:1 debates 128:1 December 10:1 10:6,17 24:10 38:21 73:10 96:14 117:12 121:4,25 decide 29:14 48:3 49:3 84:7 decided 29:10 69:4 108:2 decision 18:3,4 34:1 56:17 decisions 54:22 55:2 56:9,13 56:16 57:4 declarants 100:22 declaration 42:23 58:23 61:19 100:17 103:12 declarations	57:22,25 58:16 62:3 80:13 84:6 88:1,1,4 103:7 deduce 76:14 defeated 46:19 Defendant 1:7 1:16 2:8 135:7 136:18 defendant's 4:16,18,20 115:23 definitely 48:10 125:4 129:14 129:21 defunding 12:9 deliberations 8:21 demonstrate 123:17 demonstrates 120:4,5 depends 35:25 deponent 134:1 136:1 deposing 114:17 deposition 1:10 1:15 3:14 6:10 6:15,19,23 7:11 8:4,7,8 9:15 10:21 11:5 14:6 16:3 17:6,10 20:5 27:1 28:3,16 31:2 40:17,22 45:8,24 49:10 57:17 62:18 64:8 70:16 75:13 85:3 86:4 101:25 135:10,18,20 136:7,9,11,15 depositions 114:8 describe 28:17 45:12 described 51:7	53:10 68:15,20 109:4 describing 69:24 DESCRIPTI... 3:13 designate 31:11 designated 101:13 designates 31:12 designation 27:12 28:5 desire 54:1 65:15 detail 19:9,19,20 22:4 104:7 details 19:15 21:21 determination 14:13 determine 73:22 108:8 118:14 determined 11:3 73:23 difference 29:7 29:9 52:20 88:16 94:22,24 95:1 106:15,17 118:4,6 different 7:9,10 29:23 34:21 56:5,9,15,21 89:2 118:9 129:11 difficult 49:6 71:7 direct 47:8 48:25 51:22 52:1 125:11 directed 31:24 direction 123:8 123:10 disclosure 106:19 disclosures 4:14 31:5 105:17,19 105:20 106:10 106:11 110:16	110:20 111:2,9 111:11,12 114:9 discuss 6:18 discussed 10:10 10:20 122:20 122:22 discussion 41:15 116:12 121:7 discussions 54:5 54:8 disengaged 47:17 dishonest 105:9 district 1:1,1 3:23 4:12 10:23,23 16:23 18:5 19:23 24:11 27:16,17 27:18,24 28:11 28:20 29:20 45:14 46:18 55:11,13,19,21 69:6,7 70:24 76:23 85:16 108:2 124:12 124:22 130:21 135:1,1 DIVISION 1:2 135:2 document 20:11 20:13 60:21 103:17 doing 7:23 29:10 47:18 61:1 127:9 129:8 dollar 44:15,19 dollars 42:16 43:1,8,14,18 43:25 44:9 124:16 donate 63:9 124:1 126:11 donated 125:20 donations 48:17 118:10,15 119:9,10,10,18	donor 125:2 donors 52:19 124:1,12 125:19 doublecheck 80:25 doubt 79:18 doubting 55:5 draft 58:20,23 drafting 21:4 drawn 92:2 drew 15:24 drill 119:2 Dripping 68:9 Drive 6:7 11:7 dropped 16:6 duly 1:16 6:2 135:16 Dunlevy 58:10 60:12 83:18 102:25 Durnin 58:11 60:14 dynamic 131:4
E				
E 2:1,1 3:1,11 26:3 73:3 96:9 earlier 51:14 68:16 91:17 117:11,21 119:5,19 120:11 121:8 123:22 124:1,2 128:15 early 117:14 129:7 easier 91:7 124:25 127:21 easily 92:9 easy 40:19 125:23 effect 22:20,22 26:23 108:5,6 109:13 123:6,7 124:7 effort 91:20 efforts 58:4				

either 10:22 16:14,15 31:14 63:13 78:20 92:19 112:18	entry 91:10 94:1 equally 49:7 Errata 134:9 especially 48:13 123:18 127:7	example 29:17 51:10 59:11 69:22 93:22,25 94:6 105:23	80:18 81:25 82:6,8,10 83:6 83:9 84:10 85:1,4 86:4 87:24,25 88:5	experienced 48:24 expert 114:19 Expires 137:9 explain 49:14 55:5 97:10
elaborate 123:13	established 125:9	establishment 130:15,15	88:18,20 89:8 89:9,19 90:1 90:17 93:22	extent 10:8 21:24 31:23
elected 105:12	establishment 125:9	examples 105:16	95:14,15 99:6	39:21 88:24
election 3:18,21 3:23 4:12 13:16,17 14:15 14:19 15:5 20:23 23:10,12 24:10 25:11 26:14 28:20 41:8 52:10 56:6,10 65:18 66:14 73:16,20 83:16,17 108:1 109:1,2 124:10	exchange 5:5 52:23 68:21	exchange 5:5 62:21 84:11,13	100:16,18,20 101:13,23,24	93:9 99:3,11 113:15,18
elections 107:22 109:5 129:5	establishment's 50:14	excited 131:23	101:25 102:21	F
eligible 9:9	establishment... 124:6	exhibit 3:14,15	102:22 103:15	F1 85:10 91:3,4
eliminating 106:3,4,5	estimation 42:13 42:24	estimation 42:13 4:14,15,17,19 4:21,23 5:1,3,5	103:17 105:12	Facebook 8:25 34:24 36:7,8 36:11,12,13 128:17,17,20
email 4:7 27:3 35:8,8,11,11 35:16 39:13 125:8,17,23 126:20,21	evaluate 52:12	5:7,8,10,12,14 5:16,18,20,22	107:20 110:15	fact 41:25 48:23 61:13 68:9 99:4
emails 35:25 125:23	event 12:4	5:24 7:10,12	111:6,19,25	facts 31:13 46:4
employed 136:21	everybody 47:19	7:17,25 8:4,5,7	112:21 115:20	factually 92:5,6
enacted 22:19 22:23 108:3	everybody 's 30:15 46:22	9:12,13,16	115:21,22	fair 53:16 65:19 70:5 107:16 119:1 137:4
encourage 127:6	everybody's 123:25 124:23	10:14 11:4,5	120:13,20	fairly 58:22
ends 121:19,22	evidence 62:6	13:17 14:4,6,6	121:12 136:9	familiar 20:11 57:23 59:16
engage 127:14	80:4,4 84:7	15:4 16:2,3,14	130:20	far 31:16 57:13 88:25 93:10
engaged 12:2 47:20	evolved 12:3,3	17:3,10,13	101:4 102:9	101:4 102:9
enter 18:20 50:5 124:20	ex-mayor 50:9 50:13	20:4,6 21:2	118:5 123:19	118:5 123:19
entered 17:14	ex-mayor's 50:8	22:13,14 23:16	130:11	faster 112:11
enthused 118:13	exacerbates 52:4,8	24:3 26:21	favor 52:23 123:10,16	favor 52:23
entire 68:2 124:13	exact 15:14	27:1,2 28:2,4	favoritism 106:3 106:4,5,8	123:10,16
entries 90:4	44:19 54:19	28:15,17 31:1	February 8:19 11:3 91:11	106:4,5,8
	60:20 108:25	31:2 33:13,14	Federal 1:22 39:16	February 8:19
	111:15	33:16,18 34:14	24:13,16,19	11:3 91:11
	exactly 25:16	39:3 40:17,18	25:1,15 26:10	Federal 1:22 39:16
	38:10 44:16	40:22,24 45:7	26:18 92:11	feeds 120:1,6
	50:16 109:22	45:9,23,24	experience 18:19	feel 22:2 66:24
	126:12	53:17,20,24		75:1 114:17,17
	Examination 3:6,6,7 6:3	57:5,16,18		114:18 132:6
		62:17,18,19		fees 91:13
		64:6,8,16		
		70:15,17 71:19		
		71:20,21,22		
		72:15,15 74:2		
		75:12,13 77:15		
		77:19 79:7,11		
		80:9,10,11,17		

116:22	46:9 53:18,22	follow-ups	fundraising 4:4	28:20 73:16,20
fellow 63:17	54:19 60:20	127:11	21:25 22:16	83:17 98:6
field 107:17	73:6 80:19	followers 36:19	41:12,19,21	generally 19:8
fighting 108:9	83:11 84:20	following 12:17	53:2 65:22	20:13
figure 30:5	90:6,14 91:5	12:24 76:10	67:1,18 68:25	generate 120:6
110:3,4	92:13 96:9,11	135:15 136:16	69:3,25 70:10	generating
figured 73:13	100:3,22,25	follows 6:2	85:19 86:12	125:13
figurehead 47:3	112:10 120:18	136:11	88:8 89:10	gentleman 62:22
118:12	121:8 125:19	forbidden 99:13	94:12 97:1,7	getting 17:23
file 15:11,18,22	fine 61:16	foregoing 134:4	99:13,19	21:20 44:23
18:22 19:1	115:13	Forever 11:18	100:10,24	56:4 57:19
29:4,14,25	finish 7:1 74:5	11:19	101:11,14,19	63:8 74:24
30:3,15,19	finished 61:10	forgotten 31:6	103:9 107:21	106:7 114:19
78:2 91:25	fired 46:23	form 27:5 93:18	107:25 109:6	119:20
109:24 121:11	firm 2:4 90:7,9	134:7	109:18,20	give 7:20 13:22
filed 5:9,11,13	90:10 91:12	formal 15:10	117:15,17,22	47:3,7 53:22
5:17,19,21,23	first 3:16 4:16	forms 93:12	117:23,24	58:18 71:20
27:8 28:22,25	4:18,18,22 5:7	95:3	124:5 125:2,3	101:12,21
29:18,18 30:15	6:2 18:2 20:16	forth 114:16	125:15 126:1,7	103:12 115:7
30:16 40:3	24:9 31:9	forum 34:25	130:18,19,21	117:4 120:18
41:3 46:2	33:12,15,20	35:3 38:11	131:4	127:1,13
64:11 71:4,25	40:25 45:25	found 73:6	fundraising-w...	131:17,22
85:4,19 91:23	46:16 64:8	79:13 101:3	44:1 57:6	given 51:14
95:17,20 111:1	70:22 72:15	102:24	funds 17:15 22:7	57:13 101:14
111:8 112:3,21	79:5 103:25	founds 46:14	24:15,20 25:22	103:13 108:5
115:14 117:16	104:1 107:24	fourth 87:7	26:11 38:22,23	108:24,24
121:13	111:5,18 112:2	frankly 89:11	41:7 42:19	131:25 132:7
filings 17:22	115:23 117:9	FRCP 135:25	45:14,19 46:9	134:5 135:18
29:19,23 30:7	118:2 120:14	free 41:18 65:15	51:9 65:14	136:14
30:9 77:20	124:10,10,11	FREED-rich	92:11 93:1,25	Givens 1:19
110:18 127:18	126:25 127:13	81:2	further 3:7	135:13 137:3,8
127:24,25	first-time 17:25	FREED-rik	77:14,18	gives 52:10
filings 6:16	46:20	81:2,3	115:11 118:11	126:15 127:3
15:22 125:18	Fisher 58:12,13	Friedrich 58:11	130:2 132:15	go 19:19 21:9
fill 59:2,5	58:14 60:19	60:15 81:2,18	132:17 135:25	22:4 25:7
final 69:12	100:25 103:1	81:19	136:20,23	34:17 35:15
finance 3:19	fits 67:4	front 17:5 20:5	future 66:1,23	47:3,19 49:10
5:13,18,20,22	five 16:12 62:5	24:2 28:16	66:25 67:11	50:4,9 53:23
21:24 70:24	flip 55:13	31:2 33:21	87:16,23	54:19 58:4
71:25 85:4	floor 1:21	57:17 62:18	<hr/>	63:9 64:17
95:16,19	focused 13:13	71:19 85:3	G	73:2 75:19
financial 19:3	follow 29:16	103:16	gauge 119:5	76:2 86:1 87:6
19:17	37:5,6,8,9	full 102:12	Gean 58:10	89:25 92:8
financially	63:12 118:22	fully 79:2	60:11,13 103:2	94:7 100:15
19:22,25 67:14	127:4,7	function 93:7	103:11	112:5,11 116:9
67:24 136:23	follow-up 117:9	fundraise 18:24	general 3:21,23	120:8,10,12
find 7:9 32:23	127:15	49:7 124:22	4:12 19:16	122:11 123:4,5
			21:22 23:10,11	

123:10 125:11 125:13,14 127:22 129:16 130:13 go-to 68:15,21 69:1 goal 42:25 43:7 43:10,13,18,20 44:18 goes 50:10 102:22 109:22 118:5 going 7:7,19 9:2 9:23 10:7,22 10:24 14:5 17:24 28:3 29:6,7,24 30:3 30:10,22,23 31:22 32:1 33:11,16,23,23 33:24 36:9 40:16 42:15,25 50:5,14,16,19 64:7 66:13 68:1,2,3 69:4,8 71:20 73:23 74:8,21,25 75:1 78:18 79:4 82:6 87:22 88:14,24 90:14,16 98:9 105:21 110:4,7 114:7,16 117:8 118:15 120:10 120:12,13 122:17 124:15 124:19 131:11 131:17 goings-on 40:13 good 50:17 61:14 64:1 67:21 73:17 105:10 107:8 115:13 116:8 125:10 gosh 121:6 governance 55:3	graduated 13:9 great 15:17 19:9 115:21 129:25 group 35:12 48:2 125:10 guess 8:20 26:14 40:8 73:13 92:2 96:21 97:4 106:25 118:3 125:19 guesswork 62:7 H H 3:11 half 75:5,7 112:23 Hall 1:21 hand 14:5 28:3 33:11 handed 33:16 handful 62:1 hang 35:6 happen 15:6 67:3 75:3 114:14 happened 111:1 132:11 happening 47:9 happens 47:24 50:12 109:1 124:8 hard 76:10 78:5 78:6 125:17 harder 125:1,5,6 harm 49:25,25 50:3 hat 29:6,24 hate 92:8 head 31:7 64:25 105:15 122:23 headed 40:25 104:7 hear 7:8 126:10 heard 119:1 hearing 62:20 Held 3:21 help 76:18 80:5 helping 89:23	helps 80:22 90:24 117:2 Hendrix 62:23 62:24 63:10,13 84:14 HendrixK1224 5:5 HendrixK1234 62:24 Hertel 59:16 60:13 hey 50:5 51:14 62:12 Hicks 2:9,9 3:6 3:7 6:4,12 7:4 7:18,22 8:1 9:11 10:13 13:20 14:2 15:23 17:1,5,9 19:18 20:3 22:12 23:14,19 23:21,24 24:2 26:25 28:1,14 30:25 31:6 32:1,6,18,21 33:9 39:24 45:6 51:4 53:19,21 61:9 61:13,17 62:15 63:21 64:2,7 68:19 69:17 70:14 72:14 75:10,17 80:9 82:2,5,10,13 82:19,22,25 83:5 84:24 89:5 90:17 91:1 93:13 95:13 99:4 110:11,15 113:20,25 114:4,25 115:3 115:7,12 116:8 116:12,24 117:1,4 122:11 123:21 128:16 130:3 132:15	136:12,18 high 6:7 11:7 55:12 hire 98:9,17 hired 98:5,6,12 historically 42:16 hold 14:9 71:19 72:5 115:20 121:14 homeless 128:6 hop 6:13 hopefully 35:14 hot 101:20 128:4 hours 136:12 Houston 2:5 hundred 48:19 49:2 69:13 hundreds 48:16 124:16,18 hurt 69:2 hyped 124:23 hyphenated 81:17 I idea 106:23 109:23 ideas 41:17 identify 16:13 17:7 II 53:24 imagine 127:10 immediate 39:15 127:16 127:17 immediately 49:4 130:20,21 important 49:12 67:22 in-unison 48:15 inaudible 82:4 include 99:6,9 102:18 included 98:25 includes 113:10 121:15 136:16 incumbent	46:19 47:24 incumbents 16:14 47:23 indication 8:20 indications 8:22 indistinct 15:5 individual 14:18 15:5 126:24 127:13 individuals 57:22 80:10,19 81:23 influence 123:9 123:17,19 influenced 123:3 inform 40:5 informal 90:12 information 126:16,19 136:14 initial 4:14 31:4 127:12 injunction 58:4 62:20 injured 46:10,13 instance 1:16 106:10 108:23 intend 73:15,17 73:19 intent 25:23 interest 11:22 120:6 122:21 128:1 interested 12:14 12:16 55:23 136:24 internal 8:21 interrogatories 4:16,18,20 33:15,20 112:10 115:23 interrogatory 34:2 114:10 115:10,15,24 interrupted 100:8
--	--	---	---	--

intervening	60:18 100:24	84:2 98:8	129:8,11,11,24	113:18,21
122:6	103:1	100:4	130:9,25 131:7	114:24,25
invite 37:8	joke 67:21	know 10:11	131:16 132:1,5	117:25
involved 89:16	judge 119:10	18:10,11,12	132:5,10,11,12	legality 100:11
109:19 123:4	July 15:12,13	19:10 24:16,20	132:13	legally 32:15
iron 101:20	85:5 88:2	29:12 30:10,17	knowing 59:9	99:17
irreparably	95:24,25 102:1	31:3,10 32:8	73:23	legitimate
46:10,13 49:25	120:15,21	32:15 35:19	knowledge	105:24 107:9
50:1,2	jump 124:10	36:22,25 37:1	31:13,19 46:5	107:11,12
issue 12:4 25:2	jumping 17:25	37:2 39:22	110:25	let's 6:13 9:3,11
32:5,17 40:11	June 8:9 71:25	42:20,22 48:8	known 29:24	13:9,20 17:1
50:16 55:17	77:20 103:3	49:21 50:6,6	117:25 130:22	20:3 22:10,12
100:12 106:14	112:1	50:15 52:9,16	131:24	23:14 26:25
120:10 128:4	justification	53:4,15 56:16	knows 113:21	45:6 57:1,1
issues 41:18	51:14,19	58:6,20 59:15	115:1	59:23 63:7
42:2 43:15		60:1,2 61:22		64:2,17 70:14
54:1,21 55:4	K	62:13,14,21	L	72:14 75:10
56:3 104:4,5,5	keep 30:6 48:10	63:2,13,13,15	late 17:18,24	76:2 79:7,22
104:6 107:13	54:12,16 60:11	63:21,23,25	18:20	83:5 89:25
122:21 125:25	60:12,17,19	66:9,12,15,17	latest 78:8	92:8 100:15
126:4,8 128:1	114:16 130:13	66:19,21 67:7	Laura 2:12 7:8	110:7 118:2
item 39:2,8	130:14	67:16,20,22	7:20 23:24	120:8 123:2,3
itemized 92:10	keeping 23:24	68:1 69:7,11	68:9	127:12 130:22
items 106:20	52:19	70:19 74:8,22	law 2:4,9 4:4	level 21:12,24
	kept 41:22 44:23	75:6,7 76:11	10:16 22:15	108:2
	54:14	78:13,19 83:21	90:7,9,9 91:12	leveled 21:20
J	Kevin 58:10	83:23,25,25	lawsuit 40:3,9	Liberty 13:5,7
January 76:3,24	60:12 83:18	84:2,5,16,20	41:3 91:22,23	lifted 117:17
77:5,11 78:8	102:25	84:21 89:1,14	lawyer 31:12	lifting 12:8
95:17	killed 49:13,18	89:17 90:13	51:15,17 91:19	limit 4:4 14:22
Jennifer 1:3,11	49:20	91:24 92:3,5,6	92:4 100:2	21:25 22:16
1:15 3:5,14 4:7	kills 47:12	92:6 93:10,13	114:13	limitation
4:22,24 5:24	kind 20:20	93:19 96:20,21	106:10	106:10
6:1,7 10:9	62:11 67:3	98:17 99:22,23	limited 49:7	
31:22 39:22	68:15 99:16	99:25 101:8,17	limits 3:19 4:5	
41:1 55:16	108:6,17	101:18 102:9	14:12,16,18	Linda 58:11
113:14 126:5	127:11 128:2	103:9,13,23	60:14	
133:2 134:3,13	129:12	108:11,13	LINE 133:5	
135:3,10,16,21	Kirk 48:8 50:5	112:4 113:9,11	link 55:6 56:13	
Jennifer4Austin	51:9 69:4,7,20	113:15,16,23	57:3,8	
5:6 63:8	124:14 130:13	114:4,10,14	list 16:14 31:14	
Jerad 2:4 6:16	130:25 131:24	116:23 117:14	32:25 34:10,21	
6:20 63:18	132:11	119:20,21	35:13 36:8	
84:22 116:4	knew 10:21 18:2	122:21 123:3	59:8 100:21	
136:12,18	18:14,15 42:16	124:19,19	102:25 104:4	
Jerad's 90:7,9	42:17 43:5	125:3 127:5,14	105:16 125:2,2	
jerad@najvar...	50:7 59:12	127:23 128:2		
2:6	74:16,21,25	93:16 94:23		
John 58:11,14		99:3 100:1		

125:12,14	longer-term	love 131:19	48:20 49:4	60:15,16,18
126:20,21	119:11	lunch 50:9,10	126:25	mediums 34:21
listed 34:18	look 8:6,23 9:11	M	maxed 79:22	meet 6:18
79:14	9:16,19 11:5	machine 1:20	103:6 127:8,15	127:23
listing 129:1	13:20 17:1	mail 125:20	maximum 14:11	member 47:25
lists 35:11	20:3 21:1 22:5	129:12	mayor 8:16,18	106:20
little 49:10	22:6,10,12,21	mailer 129:17	8:24 10:25	members 16:15
61:10 71:7	22:25 23:14	129:19,21	11:3 13:17	55:9,15,22
82:11 91:7	26:25 31:9,10	mailers 129:13	15:12 16:9,16	98:7
111:8 118:22	33:3 34:2,3,17	129:22	27:17 28:10,12	Memorandum
123:13	35:2 39:2 41:5	main 20:19,19	28:23 29:11	3:18
live 6:6 34:25	45:6 53:18	20:20	30:13 42:15,17	mention 106:2,3
35:3	55:16 64:14	maintaining	43:6 55:2 61:6	mentioned 38:3
lived 27:21	70:14,23 71:6	36:15 37:12	69:5 123:18	message 47:8
Inorton@austi...	71:11,22 72:3	majority 50:20	130:22 131:8,9	118:11
2:14	75:10,13,24	making 18:4	mayor's 9:5	messed 77:25
loan 25:2 71:13	76:9,11 77:1	28:8 49:5 65:8	mayoral 43:14	method 1:20
73:7,15,18,19	79:4,5,10	120:3	43:25 46:13	million 43:1,8
74:1,4,7,17,22	80:17,17 81:18	manipulation	48:9 85:5	43:13,18,25
76:6,8,22 77:6	83:6 85:8 86:6	52:18	86:13 95:16	44:9
78:22 86:21,24	86:23 87:25	manner 54:1,21	130:6	million-plus
93:7,17,17,20	90:20 96:8	March 31:9	mean 18:12	42:16
94:24 95:9	97:14 103:11	91:23 94:1,5	24:22 25:14	mind 19:18 23:8
96:4,14,17,24	110:7,17 111:5	Marie 6:7	30:16 40:13	42:14 43:20
97:6 98:23	111:9,14,19,25	mark 7:24 8:3	41:16 42:13	44:18 66:17
99:8,9,11,17	111:25 112:5,9	marked 8:5 9:13	44:22 55:10,19	89:21 108:25
99:21 102:4,19	112:13,20	14:4,6 16:2	59:3,25 60:1,1	110:9 119:22
117:10,12,21	113:2 120:20	17:3 20:4	60:2 62:11	128:6
118:16,18	121:4,17,19	22:13 23:16	64:16 67:11,16	mine 69:7
119:4,5,7,13	125:17,18,19	27:2 28:2,15	68:5 72:5	minute 30:11
120:10 121:8	looked 64:15	31:1 33:13,18	83:11 93:15	116:9
122:6 130:7	80:18 84:10,19	40:17,18,24	95:20 98:18	minutes 38:18
loaned 24:14	looking 12:10	45:7,23 57:16	100:14 104:22	61:8 130:17
loans 72:25 73:4	16:3 18:18	62:17 64:6	106:4,25 107:1	136:12,12
92:19	19:8,15 26:21	70:15 71:21	114:2 115:6,13	mislead 32:12
lobbying 106:2	72:12,16,18	75:12 82:8	117:15 118:25	misleading
Local 12:18,20	76:19 81:7	83:9 85:1	124:21 126:12	32:11
lockstep 47:10	91:2 98:14	95:14 101:23	means 18:9	missed 38:5
long 8:17 9:18	102:21 110:15	103:15	106:23	Mm-hm 14:14
11:12,17 34:10	looks 63:19	Marshall 63:10	meant 18:12	15:19 20:8
37:25 38:17	76:18	63:11,15	49:21	21:6 23:4
49:11 60:13	Loop 2:5	matters 13:14	measure 105:25	24:25 26:16
75:4 93:3	lost 46:20	78:19	106:13,25	40:1 51:24
114:5 127:12	lot 18:7 48:11	matures 73:12	107:1,7,10	54:6,23 60:22
127:13	109:24 115:6	maturity 73:10	measures	60:25 76:20
longer 49:10	124:21 125:16	73:11,12 96:17	105:13	77:8,10,13,17
52:21	127:21 128:23	max 2:9 48:4,13	media 60:11,12	77:21 81:5

83:15 84:12,15	movement 47:2 47:4 118:12	67:23 74:25 75:1 86:1 98:9 N N 2:1 3:1	13:18 14:19 17:12 27:17 28:10 38:21 41:8 42:1,21 42:24 43:2,3,8 43:14 44:1,7,9 needed 18:23 42:6,22 74:18 74:19 needs 70:5 114:13,20 neither 136:20 never 88:14 89:11,13,13,21 92:21 114:15 new 21:5,14,14 64:23 69:1 82:6 132:9 news 12:18 newspaper 12:20 nice 101:19 nine 103:8 no-bid 106:6 Nodding 105:15 122:23 nominal 111:22 113:24 114:1 116:1,3,16,19 nonresponsive 69:18 normally 127:10 North 2:5 Norton 2:12 names 15:24 60:5 narrative 9:18 narrow 77:14,18 NAVJAR 2:4 nearly 29:3 46:19 55:13 86:9 91:23 102:15 necessarily 65:25 98:20 need 7:11 8:22 14:8 22:5 33:5 51:18 53:17	16:21 20:21,23 22:7 27:13 41:8 65:16 122:20 Officeholder 5:9 5:11,17 officer 135:17 136:15 officer's 136:7 official 26:14 oh 7:1,18 8:1,1 number 7:9,11 7:12 9:16 10:14,24 11:6 27:24 34:8,16 49:7 80:21 90:17 97:4 100:19 125:9 numbered 1:17 71:7 81:13 92:9 numbers 97:17 112:9 numeral 53:24 O Oak 6:7 11:7 object 10:7 31:22 32:7 88:24 113:18 objection 32:19 33:7 39:20 69:17 93:8 99:2 obtain 35:14 obtained 43:18 obvious 9:3 30:18 Obviously 50:13 occasion 11:25 October 11:8 22:19,20,22,23 71:2,16 77:16 121:1,20,22 offered 62:19 offering 7:16 office 2:9 10:1 10:16,22 15:11	25:6 26:8 35:5 35:24 50:5 79:22 82:3,3 85:21 89:7 102:1 117:4 121:6 126:17 128:15 okay 6:12,18 7:3 7:13,14,21 8:3 8:6,14,17 9:2 9:17,22,23 10:12 11:4,14 11:17,21 12:13 12:23 13:16,20 14:11 15:3,8 15:15,16 16:8 20:2,2,13 21:9 21:19 22:10,25 23:13,23 24:1 24:2,18 25:9 25:12,18 26:8 26:13 27:7,18 27:23 28:13 32:4,9,18,20 33:3,9 34:9,9 34:19,21 35:5 35:6 36:2,7 37:10,18 38:3 38:11 39:7 40:16,22 41:5 41:5 43:13,23 49:13,22,24 51:13 52:5 53:12,17 54:12 55:1 57:1,12 57:15 59:18
----------------	-------------------------------------	---	--	--	---

60:20 61:12,15	116:8,25 117:1	30:21 119:15 opposed 5:1 115:14	53:18,23 64:18 71:6,8,8,9 72:3 72:6,13,19	50:7 51:22 88:18 91:19 98:7 107:6
62:2,6,18	117:8 118:20	oral 1:10,15 6:10 135:10,17	73:3 74:2 75:24 76:5	participating 13:1
63:12,17 64:2	119:19 120:8	order 3:20 5:2	80:21,22 81:1	particular 12:4 12:7 13:12
64:7,23 65:3	120:19,20	15:24 32:14	81:9,19 83:17	88:18 104:20
66:4,6,19	121:7 122:4	43:8,15 46:1	83:18 85:8,9,9	107:19 123:2
67:10,16 68:13	123:21 126:17	90:24,25	85:10 86:6	parties 135:23
70:3,3,7,12,16	126:21,24	117:17 118:16	87:7,7 89:25	136:16,21
70:21 71:6,10	127:10,20	120:9,19	91:3,4,11 96:3	party 136:10
71:11,19 72:5	128:5,12 129:2	ordinance 4:3	96:13 97:14	pass 68:4 117:5
72:11,18,19,20	129:23 131:3	22:15 23:1,22	99:5 100:23,25	130:1
73:5 74:15,21	131:14 132:14	ordinary 25:19	101:25 102:25	pasted 24:4
75:9 76:11,14	old 50:17 125:10	organization	103:1,2,25,25	pay 7:11 22:7
76:17 77:2	125:17	13:12	104:1,2,4,5,6	25:10 26:18
78:7,14 79:4,6	Oliphint 58:10	organized 7:5	104:16 105:12	
79:12,17 80:1	60:11 103:2	original 65:7	111:10,19	38:22 41:7
80:16,24 81:4	Oliphint's	135:20 136:8	113:2 133:5	73:23 74:23
81:9,15,21,24	103:11	outcome 136:24	134:8 136:5	128:17
82:7 83:2,21	once 16:21 50:9	outside 14:25	pages 34:13 39:2	payee 90:24
84:22,25 85:18	50:10 94:15	15:3 66:20	45:25 46:2	91:11
85:19,23,25	one's 20:20	67:13,15,18	92:10 134:4	paying 12:2
86:3,8,18,20	one-year 4:4	outstanding	paid 24:15,19,21	55:14,18,21,22
87:6,6,17,25	21:25 22:16	71:16 72:24	26:11 45:13	109:8,18
89:23,25 90:5	ones 48:18 58:9	76:6 77:16	60:24 61:1,3	payment 94:17
90:8,11,22	59:22 84:2	102:5,10	74:22 75:2	payments 92:18
91:2,9,10 92:8	open 65:23 69:4	outward 8:20,22	76:8,23 77:3	92:18
92:12 94:5,7	88:8 89:11	oxygen 47:11	78:7,8 79:2,21	PDF 80:22
94:22 95:6,12	101:19 107:16	49:19	87:2 91:12	Penna 59:12
96:2,3,10,13	109:2 117:16	opened 41:12	94:10	60:9
96:24 99:11,15	123:23 124:8	85:20 87:17	panel 38:12	people 16:8,13
100:2,15,15	131:10,12	94:12 97:1,8	paperwork 92:1	31:12,12 35:6
101:8,22,22	opened 41:12	99:14,18,20	paragraph 21:1	35:12,15 36:17
102:21 103:16	85:20 87:17	100:10,24	21:2 31:11	37:18 38:15
103:21 104:16	94:12 97:1,8	101:12,14	33:3,4,5 41:5	40:2 48:12,20
104:25 105:11	99:14,18,20	103:9 130:12	41:15 53:25	49:3,6,8 51:9
105:24 106:9	100:10,24	130:19	64:14,15,18,20	55:14,18 58:7
106:16,24	101:12,14	opening 15:10	64:23 65:4	59:8,19,20
107:5,19,24	103:9 130:12	67:2 103:25,25	110:17 111:19	61:17,18 62:3
108:19 109:8	130:19	104:1 124:4	113:2	62:4,7,10,12
109:25 110:6	operation	operates 51:8	paragraphs	68:21,24 69:1
110:15,22,24	125:15	21:1,2,9,10,11	21:11	69:5 79:11
111:5,7,13,17	opinion 48:24	27:8 34:5,5,6	parlay 46:17	83:12,21,22,23
111:21,25	53:15 89:3	36:12,13,15	part 22:25 26:22	88:19 89:9,19
112:8,8,9,12	opponents 30:2	39:4,5,6 46:3,9	26:22 35:22	92:16 98:14
112:16,20			40:9 47:2,6	100:17 101:10
113:1,3,12				
114:4,23				
115:12,21				

102:22 104:20 106:11 120:2 124:10,18 125:10 126:9 126:10 127:6 127:22 131:7 131:16 132:6 percent 69:13 period 20:23 21:5,15 23:10 29:4,19 42:23 42:24 46:10 52:21 69:24 70:1 79:15,21 80:14 84:5 101:5 119:11 120:15 121:5 121:20 periods 83:23 permitted 70:10 peroration 68:16 perplexed 94:19 person 38:12 48:20 63:2 109:21 person- 26:10 personal 19:3 25:22 26:11 36:11 92:11,18 93:1,17,25 94:23 112:18 115:25 116:16 personally 58:6 59:9 persons 36:4 perspective 94:23,23 phone 60:18 62:10,11 125:9 phrase 57:2 106:4 phraseology 62:22 pick 69:12 picture 21:22 63:17	pieces 129:12 pile 117:3 place 3:20,22 4:12 17:11 28:19 44:3 plaintiff 1:4 2:3 31:4 135:4 136:18 Plaintiff's 4:2,14 5:1,7 Plaintiffs 113:4 Plaintiffs' 20:6 plan 8:2 42:10 42:10 platform 46:23 55:8 124:24 126:9 128:14 played 18:4 playing 77:22 107:16 plays 52:22 pleading 45:25 46:8 pleadings 58:1 please 10:12 21:16 27:4 39:23 51:6 58:18 73:18 81:8 91:6 105:5 127:9 pledge 87:13,13 89:20 pledged 87:8 88:9,10,13,15 88:17,22 89:12 89:19,22 pledges 87:11 plenty 98:3 PLLC 2:4 plural 20:6 plus 124:14 point 8:24 24:20 61:15 81:14 98:4,13,21 103:6 105:11 123:2 130:24 131:3	pointed 114:14 123:23 pointing 123:22 points 119:2 police 12:9 128:6,8,10 policies 123:20 policy 13:14 34:25 35:3 123:1 political 4:13 13:1 18:20,22 25:23 26:17 28:21 34:18 39:18,19,24 40:3,9,13 45:12 47:1,25 platform 46:23 55:8 124:24 126:9 128:14 played 18:4 playing 77:22 107:16 plays 52:22 pleading 45:25 46:8 pleadings 58:1 please 10:12 21:16 27:4 39:23 51:6 58:18 73:18 81:8 91:6 105:5 127:9 pledge 87:13,13 89:20 pledged 87:8 88:9,10,13,15 88:17,22 89:12 89:19,22 pledges 87:11 plenty 98:3 PLLC 2:4 plural 20:6 plus 124:14 point 8:24 24:20 61:15 81:14 98:4,13,21 103:6 105:11 123:2 130:24 131:3	42:18,19 44:19 122:5,8 possibly 55:17 59:11 61:21 131:6 potential 30:2 119:6 120:2 potentially 30:7 31:13,20 Prayer 21:12 111:19 process 17:19 produced 1:15 profile 55:12 prohibitions 106:2 promise 88:13 promised 87:15 87:18,21 88:5 88:6 prop 129:4 property 128:7 128:11 propounded 134:6 provide 41:17 110:21 111:2 provision 21:20 21:23 23:5 24:5 108:3 provisional 20:20 provisionally 24:5,6 proviso 116:21 public 16:21 42:2 104:24 128:2 pull 7:20 87:24 purposes 14:15 pursuant 1:22 135:25 136:14 pursuit 6:9 put 13:16 22:15 33:10 73:14 100:11 117:3 118:7 120:19 Puts 4:3 <hr/> Q question 9:19
--	--	--	---

10:12 18:11	34:24 38:3,6	recall 12:6 13:15	regarding 40:6	95:10 122:6
19:16 31:23,24	129:3,4,10,25	21:25 25:12,25	40:7 41:17	repeat 85:24
32:15,16,19,22	raise 17:15 22:7	26:1 27:19	37:16	99:15 106:16
39:23 43:11	41:7 42:23	38:5,10,15	41:19	rephrase 49:22
49:24 51:1,5,6	43:7,13,24	54:24 60:10,14	registered 9:8	replying 63:7,10
51:17 52:24	44:14,18,24	62:5 64:24	regular 25:15	report 5:13,19
53:6,8 56:8,18	45:19 46:9,14	65:2 93:2	reimburse 26:10	5:21,23 26:5,6
56:21 57:11	51:9 65:14	receipt 27:4	reimbursed	70:24 71:25
58:6 66:16	69:23 130:5	136:3	92:21 94:16	79:16 80:7,19
69:15,19 73:17	raised 44:9,20	receive 42:8	reimbursement	85:4 88:2,5
85:24 86:1	raising 42:18	46:22	25:23	95:9,16,19
91:18 93:16	54:20 94:15	received 130:10	relate 126:1,7	101:15 118:23
99:3,4 105:5	130:20 131:8	receiving 47:15	related 40:4,7	120:25 121:11
106:23 107:9	ran 19:23 45:13	48:11	40:14 136:21	121:13,18,24
108:12 114:24	reach 59:9	recessed 64:5	relates 91:17	122:3,7,10
115:1 118:3,21	reaching 37:23	110:14	relatively	127:24
122:18 123:21	read 14:8,10	recontact 47:19	124:25	reported 1:20
126:13 131:13	17:10 21:16	reconvene 114:7	Release 39:15	reporter 7:13
questions 9:2	23:8 46:11	record 6:5 7:5	relevant 31:13	17:4 22:14
36:9 78:17	64:20 110:22	7:15 9:4 17:8	31:19 65:18	26:2,4 68:17
89:16 110:1,7	134:4	23:9 31:22	110:21 111:2	70:18 71:23
114:6 117:9	reading 12:17	32:10 65:7	relief 21:12,14	75:15,18,22
130:4,17	ready 62:7	79:24 80:10	110:5 111:20	82:9 85:2
132:16,18	ready-made	86:3 91:22	reluctantly	128:8 135:13
134:6	70:8	96:25 101:4	119:3	reporter's 3:9
quick 61:13	reality 50:22,23	116:9,11	rely 115:9	14:5 135:9
quickly 42:19	51:7,10	122:12,15,20	remaining 24:15	REPORTING
129:18	realization 75:3	128:14 129:3	25:1	137:3
quite 89:11	really 20:2	135:18 136:17	remapping	reports 26:12
quote 105:13	29:25 30:3	records 60:23	10:24 27:22	92:25 95:4
quoted 10:15	31:24 32:16	refer 7:15,17	remember 15:14	109:23 117:11
<hr/>		21:3 53:18	25:16 26:5,11	120:9,12
R		reference 53:23	33:4 35:3 36:6	127:19
R 2:1	73:22 76:11	113:9	38:1 59:15,17	represent 15:15
race 9:5,6,9	93:2 106:24	referred 51:19	93:1 111:14	24:3 65:6 79:9
16:23 17:15	114:24 118:10	124:1	121:18	83:10 84:19
18:20 19:24	119:12,13	referring 27:19	remove 110:19	103:18 104:12
24:13 26:23	126:9 129:18	37:14 39:12	Renea 2:9,9 6:12	104:13 110:17
45:14 48:9	131:12,16	66:1 104:20	17:7 31:22	110:25
55:12 70:24	reason 7:22	refers 21:4	61:7 136:12,18	representing
76:23 85:6,16	37:21 48:22	113:6	repaid 86:24	66:24
86:13 95:17,20	53:2 56:7,8	reflect 17:14	93:4 94:21	request 3:16
108:23 124:12	65:10 79:18	60:23 91:22	119:18 121:9	11:6
124:20 130:6	80:2 95:2 98:7	reflected 78:15	repay 118:16	requested 136:2
130:21	131:15 133:5	122:6	119:6 130:7	required 96:22
races 66:4,6	reasonable	reflects 101:4	repayment	requirement
radar 63:4	43:24	regard 27:12	78:23 86:21	106:19
radio 12:20	reasons 136:5			

Reread 6:16	Richard 59:15	rights 20:16	121:11,16	109:17
reserve 110:1	60:3,10	113:5	S	seconds 38:7
132:18	right 8:14,15 9:6	ring 29:25	S 1:19 2:1 3:11	110:2
reside 11:14	9:9,15,20	Robert 29:17	135:13 137:8	section 4:5
resided 11:12	12:10 14:19	58:10 59:11,23	Sandra 1:19	61:11
residence 10:25	15:6 16:18,24	60:9	135:13 137:8	secure 19:22,25
11:7	18:6 20:24	Roman 53:24	Sandy 75:20	see 8:23 9:23,24
resident 68:8,10	21:15 22:8	roughly 36:3,23	11:8 13:9 14:7	11:8 13:9 14:7
Residents 5:4	24:11 27:9	36:24 38:17	20:9 21:2,7	20:9 21:2,7
respect 88:19	28:23 30:14,20	62:3 102:14	saying 23:5	23:2 24:7 29:5
109:6 114:9	109:6 114:9	round 97:17	30:22 32:12	29:6 31:14
115:17	34:11 39:17	rule 20:21 49:18	40:9 44:3,8,22	32:2,3 34:9,22
response 9:16	41:19 44:22	57:6 68:4	45:16 46:4	39:8,9,11 41:1
10:13 11:5	45:10 47:11	135:25	52:1,3 58:5	41:8 45:19
34:2,4,7,10	50:24 55:3	rules 1:22 20:14	80:3,8 88:7,19	46:6 54:2
39:17 40:20	56:3,7,10,24	21:23 22:11	89:3,10 104:17	55:16,23 59:23
63:6 115:24	57:15 62:3,21	41:12	119:3 130:16	60:14,15 62:20
130:17	63:13 65:4	rules-based	130:24 131:7	62:24 63:1,7
responses 3:16	66:2 67:7,8,18	32:16	132:4	64:8,12,15
4:16,18,20	68:10,21,22	run 15:11 16:21	says 10:14 33:4	65:19 72:9
33:14,19,20	69:21,25 70:7	18:2,5 28:23	103:12 112:20	73:25 79:7,23
112:9,14,24	70:10 71:4,14	29:10,14,18,18	113:4,6 116:1	81:11,22 87:8
114:10 115:10	72:7,15,19	29:24 30:3,9	131:10	88:10 89:23,25
115:16,22	73:2 74:5,9,19	30:22,23 34:13	schedule 73:3	90:13 91:3,10
restart 47:19	75:10,22 76:25	38:8,9,24 41:7	85:10 96:8,8	94:3,22 97:15
restarted 13:6	78:1,25 79:2	42:17 43:6	School 4:12	100:20,22
restate 10:12	80:17 81:21,25	55:8 69:4,6,8	28:20	102:24 103:5
51:6 105:5	83:19 86:13	110:10 124:15	screen 63:4	103:22 104:10
restraining 5:2	87:3,4 91:2	124:22,23	104:5	104:18 105:14
46:1	92:19,22 94:1	running 8:14,16	screenshots 5:24	106:9 108:25
restriction 44:2	94:11 95:21,24	10:22 16:8	103:18	110:2 112:6,14
44:23 51:20	96:1,18 97:3	18:25 19:2	search 79:10	115:19 118:2
106:13,21	97:12,19 98:15	23:25 30:12	seat 55:13	119:15 120:3,8
107:21 109:13	99:19 100:15	39:5 42:15	second 4:2,20,24	122:17
restroom 110:10	101:3,6 104:13	55:4 56:10,13	seek 25:23	115:25 116:2
results 24:24	104:14 105:1	62:10 118:5	116:15,17	116:15,17
26:13	105:25 108:22	122:19 125:3	seeking 110:5,5	116:15,17
retain 126:16	109:10,13,25	130:22,25	112:17 113:13	112:17 113:13
returned 136:2	110:1 111:9,18	131:5,8,9,18	114:18,20	114:18,20
136:4	112:3,18,25	131:25 132:12	115:16 116:21	115:16 116:21
review 6:23 8:11	113:7 116:7	24:10,23 25:10	seen 6:10 109:3	Self-serving
122:17	117:12,13,18	25:25 26:13	105:9	105:9
reviewed 8:12	120:9,22 121:3	46:18 66:7	send 35:11	129:19
revised 3:20	121:4,16,23	73:13,14,16,20	118:23 122:12	sending 27:3
16:4	122:1,22 124:2	74:8,16 83:14	122:16	
rhicks@rene...	127:18 128:18	83:19 87:3	second-time	
2:11	131:1,22,25			
	132:7,9,12			

36:1,2	71:13 72:4,11	somebody 16:6 67:4,12 87:22	specific 18:11 19:15	135:1
sense 45:2 55:3	72:24 73:7,10	89:3 120:3	specifically	stay 60:2
sent 27:7 119:24	74:2,5 76:5	125:1 126:14	25:14	stick 45:21
sentence 112:13	77:15,19 80:22	126:15,17	spend 41:25	125:10
116:1	81:1 85:12	127:3 131:16	42:6,6 68:3,3	stipulated
separate 15:4	86:9 94:10	something's	75:1 118:11	116:13,23
September 1:12	96:13,25 102:1	77:25	119:14,16,17	stop 118:19
1:18 73:8 74:1	102:4 129:3	son 13:5	spending 42:10	stopped 89:18
74:6 76:24	shrink 52:21	soon 42:18	118:13	straight 82:16
77:4,7 81:4,20	sic 62:24	70:10 109:1	spent 45:18	strategic 30:4,6
103:19 112:21	sign 58:18,24	sooner 18:23	spoke 6:16	30:8 50:7
120:16,21,25	61:18 62:3	19:1,2 100:13	58:18	119:15,17
133:3 135:11	signature 3:8	119:8 123:23	spoken 60:3,8,9	strategy 18:7,13
135:23 137:1	133:1 134:8	124:9	spot 54:19	30:5,24
sequentially	136:1,2,5	sorry 7:1 8:2	spread 47:8	stream 63:24
120:14	signed 88:1	21:10 25:6	springing	Street 1:21
series 34:7 114:5	significantly	34:6 35:22	114:24	struck 101:20
serve 128:2	19:5	36:8 39:4,11	stuff 15:9	
served 112:6	silly 66:15	53:22 68:18	stupid 36:9	
135:22	similar 61:19	72:19 75:19	styled 1:17	
service 35:8,9	single 50:9	81:7 85:9,21	Subdivision	
104:7,24 112:7	sit 32:25 33:5	85:24 90:10	4:13 28:21	
set 4:16,18,20	66:9 130:4	94:4 96:1	Subject 39:15	
33:15,20 34:4	site 36:10	100:8 112:4	submit 58:15	
35:20 57:21	sitting 16:15,15	128:9	submitted 57:25	
69:1 108:4	102:9	sort 67:8 88:18	101:15 111:9	
109:25 115:23	situation 19:3	107:18 119:2,3	135:21	
sets 21:25 22:10	19:17 37:5	sought 27:13	subscribe 35:15	
seven 41:11	six 16:10 103:6	116:23	subsection 23:1	
sg-1967 137:9	skipping 64:19	sound 81:6	23:1	
Shaking 64:25	slate 52:12	83:19 101:6	substance 134:7	
short 114:5	69:12	sounds 52:1	subtract 31:15	
shorten 108:16	slide 13:24	66:15 117:13	31:17	
shorthand 1:20	Slowed 49:22	source 38:21,25	success 126:1	
21:5 22:3,4	small 69:9 97:21	78:22 86:15	successfully	
135:13	97:24	106:7	108:9	
show 40:16 64:7	smaller 52:19	speak 54:1,7	sucks 47:11	
65:7 77:6,11	127:1,2,3	63:5	49:19	
78:11 82:6	smaller-dollar	speaker 47:4	sued 20:14	
90:6 91:10	48:17	speaking 20:13	sufficient 130:5	
96:4,17 97:17	snail 125:20	54:12,14,16,21	suggest 109:15	
102:14 117:11	social 60:11,12	60:10 99:18	123:5	
showed 87:11	60:15,16,18	126:8,11	suggested 53:6	
shown 40:23	solicit 20:22	speaks 53:25	suggesting 32:11	
135:23	26:17 88:9	special 36:10	suit 91:25	
shows 14:19	solicited 88:11	specially 37:15	Suite 2:5	
15:4 16:8 27:8	88:15	STATES 1:1	summary 65:19	

super 131:23	62:16 70:14	temporary 5:1	think 7:7 8:13	thousands 48:17
supplemental 4:18,22,24 33:19 34:3 40:25 45:9 115:22	75:11,21 82:1 82:2,3 84:24 95:13	46:1 58:3 tends 120:5 127:18	10:10 11:2,2,3 11:13 13:11,24 19:16 25:16	124:16,17,17 124:18
support 5:3 67:5 67:12,14,25 106:13 119:6 123:16 131:17	tabbed 7:6 Tabs 17:1 take 8:6 11:21 22:19,20 35:2 55:15 64:2 75:4 76:13	tens 124:16,17 term 24:6 32:11 52:25 53:1 115:6 119:22	29:13,13,18,22 29:23 31:24 32:10,24 34:3 34:4 35:24	Thread 63:25 64:1
supporters 40:5 46:21 47:1,16 66:25 69:6 70:8 118:8 123:16	82:13 107:20 110:12 119:10 taken 1:17 32:25 103:19 136:16 136:23	18:20 106:18 109:16 testified 6:2 109:9 123:22	40:4,11 47:17 48:7 52:4,22 53:7,16 55:21 55:22 57:22	three 29:18 59:8 75:5,7 76:19 79:5 102:24 110:2
supporting 47:5	takes 22:22	testify 114:19	62:1 68:12	three-page 103:17
suppose 12:21	39:16 42:16	testifying 65:10 119:19	70:5,7,12 72:23 77:3	throw 29:6,24 49:4
supposed 19:12	123:9	testimony	78:12,17,18	tie 125:25
sure 9:3 10:13 10:15 17:9 18:4,9,16,16 18:23 29:16 60:6 61:9,12 72:14,18 76:12 82:16 83:8 87:2 98:10 101:18 110:23 113:11 122:13 126:12 128:13 129:22	talk 84:22 117:9 122:25 talked 38:12 110:16 112:24 117:11 129:3	131:14 135:18 136:15	80:2 83:5,16 86:1 87:1 88:6	tied 125:1
surprise 79:19	talking 7:17	Texas 1:1,20,22 2:5,10 6:8	88:7 89:2,3,9 90:23 91:7	till 7:1 29:3
Susan 58:11 60:15 81:1,19	65:4,9 76:21 80:20 120:11 122:21 125:25	10:16 135:1,14 137:4	93:11,11 100:1 105:24 106:6	time 10:19,21
suspect 103:23	talks 87:7	text 46:8 60:18	110:1,1 116:9	13:2 15:11
swamp 69:25	tap 70:8	Thank 26:4	117:11,13	18:14,16 19:4
swearing 112:17	target 129:16	87:24 89:24	76:10,13 84:6	
sworn 1:17 6:2 135:16	targeted 129:21	119:1,18,20	92:7 94:14,17	
<hr/>	taxes 128:7,11	115:21	122:24 123:5	96:22 101:15
T	technically 27:8	Thanks 63:8	123:11,15	116:10 122:14
T 3:11	tell 12:11 34:6	therefor 136:6	124:4,8 126:8	123:2,2 124:5
tab 7:8,9,15,19 8:3 9:11 13:21 15:23 20:3 22:12 23:14,25 26:25 28:1,14 30:25 31:10 45:6 53:19	36:17,19 37:18 37:22 45:4 50:4 52:11,14 57:18,19 62:23 77:4,5 80:21	they'd 59:5	128:15,25	129:5,7 136:10
	104:1 110:4 119:8	thing 27:11	thinking 18:1	136:15
	telling 40:2	30:16,17 62:11 67:10 75:5	30:9 67:10 85:21	timely 9:8 54:1 54:21
	temporal 48:22	78:20 81:7	third 71:6,8,8	times 38:8
	51:19 106:13 106:21 107:21	98:5 118:18,25 119:11 131:11	72:19 85:8,9,9 86:6 104:6,16	114:15
	108:11 109:12	things 6:22	105:12	timing 18:1
		18:23 34:17 40:12 53:10	Thomas 29:17	98:11 109:6
		55:14,24 56:15 57:4 61:14	thought 29:23	today 33:1,6
		92:9 115:6	42:6 49:11 56:14 68:24	45:21 102:9
		122:20 125:19	96:23 108:25	116:14 130:5
		126:6 127:8	113:17 131:15	today's 6:15
		128:20 129:12	132:4	told 69:10
		130:23	thousand 38:1	ton 129:25
			48:19	top 31:7 90:2 128:6
				total 85:12

97:18,18 99:6 102:18 touch 59:18 60:2 60:11,12,17,19 town 42:17 Trail 137:4 transcript 3:14 6:23 8:8 135:17,20 136:4,9 transcription 134:5 transparency 107:2,3,13 treasurer 3:25 4:8,10 17:13 27:6,12 28:5 treat 88:4 treating 99:12 trial 132:18 trick 32:22 74:11 77:24 tricked 75:20 tricks 77:22 true 11:10 46:5 52:16 58:24 104:24 135:18 trust 50:19 truthfully 51:5 try 30:6 57:2 78:20 117:17 127:6 trying 19:19,21 21:21 30:5 32:11,21,22 40:8 45:1 57:7 74:13 77:22 80:5 82:25 98:9 105:6 106:24 110:3,4 117:15 119:2 121:8 127:23 turn 14:25 71:9 101:25 TV 12:20 129:24 tweet 5:5 62:21 63:6,6,22,24	84:11 tweets 37:19 Twitter 8:25 9:1 34:24 37:11,12 37:14,17 84:13 128:24,25 two 17:6,14 20:14 22:10 29:18 33:11 46:2 56:15 57:8 61:13 80:19 83:11,12 91:24,24 101:3 112:14,23 130:23 two-sided 70:20 70:22 71:24 72:8 type 69:21 types 129:8,10 typically 37:22 42:17 127:2 <hr/> U Uh 90:5 Uh-huh 21:17 59:13 107:15 ultimately 29:14 unclear 32:12 unconstitutio... 23:6 understand 14:7 32:6,19 40:8 48:22 57:10 67:23 74:13 77:23 80:3,6 82:22,23 89:1 89:12,16 92:15 105:4,4,6 106:24 107:10 107:20 109:20 109:22 114:12 114:21 116:4 116:24 131:13 understanding 10:18 42:4,5 43:23 46:12 53:2,4 87:14	87:15,20 88:17 89:15,17 95:8 95:11 104:25 105:7 108:8 109:3 understood 56:22 130:16 130:23 131:14 unfair 68:25 69:14 73:2 108:15 unison 47:10 UNITED 1:1 135:1 unitemized 87:8 87:13 unpaid 24:13,16 24:21,21,22 25:1 unreimbursed 22:8 25:21 26:18 unsuccessful 22:6 24:7,9 updated 32:2 upload 35:11 upshot 113:12 upside 17:10 use 7:7 32:10 35:25 36:11 38:22 51:9 65:17 74:18 93:18 104:23 118:11,17 125:14 130:15 uses 24:6 USPS 129:13,22 usual 7:6 usually 7:10 UT 13:7 <hr/> V v 1:5 135:5 Valley 137:4 vary 37:24 127:2 verification 4:22 4:24 40:25	45:10 46:3 verifications 89:7 Verifications/... 5:3 verified 112:16 verifying 53:25 version 16:4 22:3,4 versus 118:7 124:6 viability 120:4 view 36:17 violations 20:16 Virden 1:3,11 1:15 3:5,14 4:7 4:22,24 6:1,5,7 8:6 10:15 17:11 39:15 41:1 55:16 115:17,24 116:2,14,15,17 117:8 133:2 134:3,13 135:3 135:10,16,21 Virden's 3:16 4:16,18,20 5:24 126:5 voice 47:10 48:15 volunteer 61:2 vote 9:9 50:16 105:21 106:12 voters 9:8 votes 106:20 <hr/> W W 1:21 wait 7:1 29:3,5 43:11 47:13,14 51:1,1 waited 91:24 waiting 70:9 want 13:17,22 18:10,12 22:21 23:25 30:9 32:2,8,10 33:10,24 34:17	37:3,6 41:7,17 41:23 46:11 49:21 51:3 52:13 54:20 55:5 56:23 58:20 61:19 65:14 66:2,16 66:16,19,22 67:11 69:10,11 78:20 79:10 80:25 81:12,12 81:14 84:7 89:17 92:3 98:20 100:4,12 105:8 117:9 118:10 119:12 119:13 123:1 130:13 131:17 wanted 18:5,17 20:2 29:5,12 29:25 30:2 40:5 41:23 42:6,8,18,25 43:9,16,17 44:24,25 45:3 53:23 56:8 57:5 59:4,14 59:24 65:12 81:18 84:22 101:20 119:16 123:23 131:21 131:22 wanting 41:16 wants 115:1 war 47:22 67:25 wasn't 18:10 44:19 74:25 watching 30:15 109:22 Watson 48:8 51:10 69:4,20 124:15 130:14 131:24 132:12 Watson's 50:5 130:25 way 12:7 19:4,8 22:2 35:17,18
--	---	---	--	--

36:21 43:9,15 44:24 45:3 50:5 51:3,7 52:12 56:23 69:24 73:22 78:15 93:21 95:3 114:16 118:15 123:4 126:20 128:24 ways 46:16 104:17 we'll 13:24 31:11 48:8 127:8 132:17 we're 7:7 11:4 18:25 47:18 65:4 76:21 78:18 79:4 84:22 86:3 103:8 114:7 we've 7:6 80:19 110:16 website 5:24 35:15,21,22 103:19 125:16 welcome 79:9 well-connected 69:16 well-funded 46:19 48:2 Wempe 59:15 60:10 went 51:25 109:13 116:10 122:15 weren't 24:21 44:3 92:19 131:4 West 2:5 WESTERN 1:1 135:1 Westminster 35:4 38:11 widely 37:24 wife 81:17 William 58:11 59:16 60:13,17	willing 59:3,5 win 57:7 window 15:18 17:22 18:15 41:12,22 48:23 53:3 65:23 66:20 67:1,13 67:15,18 69:3 69:8 76:16,25 85:19 86:12 87:17 88:8 89:11 94:12 97:1,8 99:14 99:18,20 100:10,24 101:11,14,19 103:9 108:17 108:17,18,20 109:1 117:15 117:17,22,24 123:23 124:4,9 130:12,18,19 131:4,12 window's 131:10 wings 70:9 winning 56:5,10 wish 66:25 wishes 66:24 Withdrawn 5:15 witness 1:16 19:12 23:18,20 26:3 75:16,20 117:5 128:10 128:13 130:1 135:16,19,23 wonder 30:2 wondering 30:22 78:2 word 29:13 43:9 43:15 44:23 45:3 63:8 64:1 79:10 104:18 104:22 work 35:10 80:5 89:12 91:18	worked 58:22 worker 61:3 working 109:16 37:9 48:25 60:2 109:18,20 world 18:24 78:20 wouldn't 67:14 99:20,21,22,23 117:23,25 118:1 130:25 131:5,16,25 write 75:18 writing 25:17 wrong 34:5 45:17 57:19 66:1 72:13 75:19 104:1 wrote 42:14 X X 3:1,11 Y y'all 7:20 62:19 114:15 y'all's 14:3 yeah 7:18 8:1,1 18:25 21:3,10 25:15 31:20 34:4,7 39:12 49:16 52:15 60:6 61:12,16 63:20 65:5,5 66:15 68:11 71:9 72:5 73:5 74:15 75:20 80:18 82:19,22 82:25 83:2,5 84:21 87:5 88:12 92:2 94:9 95:7 99:7 100:7 111:12 111:14 117:1 120:19 123:7 129:13,13,21 129:21 131:20	year 30:13 52:10 52:22 65:18 69:9,11 85:22 years 11:13,20 11:20 107:24 108:7 109:12 Young 13:5,6 Z zero 77:12 78:11 87:11 Zimmerman 108:1 zip 68:12 0 1 1 3:14 8:4,5,7 11:6 21:11 22:12 41:6 103:3,24 1,400 37:3 1/15/2021 77:2 1/15/21 5:13 1/31/24 137:9 1/4/22 5:21 1:21-CV-271- 1:6 135:6 1:32 64:4 1:40 64:5 10 3:23 4:7 10:23 16:23 18:5 19:23 24:11 27:1,2 27:16,20,21 34:3,8 45:14 46:18 47:14 55:11,20,21 57:21 61:17 62:7 69:6,7 70:24 76:23 79:11 80:10,19 83:12,23 85:16 87:25 100:17 100:21 102:22 109:12 124:12 124:22 130:21	10,000 91:12 10/27/20 5:9 100 38:7 101 5:22 103 5:24 10th 27:9 89:25 91:3,4 11 4:9 9:11 28:2 28:4 34:16 47:14,21 48:10 50:4 124:13 117 3:6 12 4:11 28:15,17 12/8/20 5:17 12:15 1:18 1224 62:24 12th 100:23 103:1 112:21 13 4:14 11:13 31:1,3 45:6 102:1 110:15 130 3:7 133 3:8 134 3:9 14 3:17 4:15 33:13,14 14th 80:22 81:9 15 4:17 8:3 10:17 31:9 33:16,18 34:4 34:14 39:3 62:2 103:2 111:25 115:21 115:22 150 103:1 155,000 130:12 15th 10:1,6 38:21 73:11 76:3,24 77:5 77:11 78:8 85:5 88:2 95:24,25 103:19 16 3:20 4:19 34:13 40:17,18 16th 22:20,22 17 3:22,24 4:21
---	--	--	--	---

17:16 40:22,24	20,000 98:16,18	15:20 27:17	108:7 120:13	117:10,21
62:16 94:1	200 80:23 103:3	28:10,25 31:9	120:21 121:3	118:19 119:13
111:19	103:13	37:2 41:8	121:12,24	119:16 130:7
17th 8:9 17:15	2008 11:24 12:3	42:21 65:22	250 100:25	301 1:21
18:15 94:5	12:6 109:9	66:7 95:17	255 2:5	301-7088 137:5
100:25	2012 12:3,6 13:9	102:2 103:1,2	25th 83:17	303187 2:10
18 4:23 21:9,10	2015 13:9	103:3,20 112:1	120:25	31 4:14 5:24
45:7,9	2016 12:3,6	112:23 133:3	26 5:14 46:3	80:23 103:15
18,887.39 85:13	2017 11:8 22:19	135:11 137:2	65:22 82:8,9	103:17 105:12
180 107:25	22:20,22 23:22	2024 108:23	82:10 135:24	31st 83:17
18th 72:1 77:20	20171005-029	20th 83:18	26th 137:1	121:15
81:4,20	4:3	21 1:12 5:5	27 4:7 5:16 71:2	32,000 129:17
19 5:1 20:3	2019 12:9	62:17,18 75:11	83:7,8,9	326,000 98:19
45:23,24 53:17	2020 3:23 10:3,6	75:15,21,21	27th 92:10	326,847.69 99:5
53:20 57:5	10:17 12:9	84:10 133:3	28 4:9,11 5:18	327,000 97:19
113:2 136:12	16:24 17:12,16	135:11	17:2 85:1,2,2,4	32nd 103:1
19,000 86:9	24:10 26:23	21,000 97:18	86:4 88:5,18	33 4:15,17
1997 50:15	29:17 36:24	2180 2:5	90:1,19,20,20	350,000 102:15
107:22	38:21,23 60:24	21st 1:18	93:23,24	102:18
19th 28:25	70:24 71:2,17	22 4:3 5:7 64:6,8	281 2:6	365 108:4
1A 23:15	73:8,11 74:6	111:6,19 112:1	29 5:20 95:14,15	365-day 20:23
1st 41:3 120:15	76:15,24 77:2	22nd 15:12,20	99:6 100:16	365th 23:11
120:21	77:5,7,16	81:1,19 92:9	136:12	
2	80:23 81:4	23 4:5 5:8 64:14	29th 102:25	4
2 3:3,15 9:12,13	82:18 83:13,18	64:18 65:4,5	2nd 1:21 91:11	4 3:6,20 16:2,4
9:16,16 10:14	86:19 120:15	70:15,18,19		16:14 28:1
10:14 11:5	120:16,21,22	73:8 76:22		34:5,5,6,13
17:1 21:1,2	120:25 121:1,4	77:15 79:5,7	3 3:4,17,23 14:4	39:2,5 97:15
22:25 91:11	121:20,25	80:10 82:2,3,7	14:6 17:12	102:14
136:12	2021 8:9,19 27:9	82:17 120:13	21:1,3,11 27:1	4/1/22 3:18
2-2-7 23:2	36:25 38:21	120:20,24	39:2,8 41:5	40 4:19,21 38:16
2-2-7(B) 26:22	41:3,6 42:1	121:12,19	53:23	38:16
2,000 79:21	43:4,5,8,15	23rd 74:6 76:24	3,500 36:6	400 14:19 83:13
2,205 45:13	44:1,7,10 45:4	77:5,7	3/15 31:8	83:18 100:23
2,500 36:4 38:1	46:4,10,15	24 5:10 71:17,21	3:10 122:14	102:25 103:12
2:41 110:13	50:15,24 51:11	71:23,24 72:17	3:13 122:15	404-4696 2:6
2:51 110:14	62:9 72:1 76:3	72:18 74:2	3:27 1:19 132:19	41,000 14:24
20 4:1 5:3 37:24	76:24 77:5,11	76:22 77:19	30 5:22 38:7,16	68:11
57:16,18 61:4	77:20 78:9	80:17,18 82:17	101:23,24,25	42 97:1
70:14 79:11	81:20 85:5,21	84:24 120:13	136:3	45 4:23 5:1
80:12,13 82:1	91:12,23 94:1	120:13,20,21	30-day 15:17	38:18
87:24,25 88:20	96:14 99:18	24th 77:16	29:4	450 48:20
89:8,9,19	100:23 117:12	120:16,21	30(f)(1) 136:1	480-8231 2:11
96:14 100:19	117:16 129:4	121:1,20,22	300,000 96:4	4th 1:21 95:17
100:20 101:13	135:24	25 5:12 75:12,13	97:7 98:19,21	
102:23,24	2022 1:12,18	75:16,17 76:22	98:23,25 99:8	
107:24	3:18,21 13:18	91:23 95:13	99:9,11,17	5 3:22 13:21
			102:1,4,19	17:3,4,6,11

39:2,6 85:8,9 85:10 86:7 97:15 99:6 102:14 111:19 113:2 5,000 36:5 5/6/21 4:7 50 81:1,4,19 50,000 71:13 72:24 76:22 77:20 86:21 93:20 120:10 121:9 5000 137:8 512 2:11,13 137:5 55 11:20,20 57 5:3 58th 96:13 5th 22:19,23 83:13	74th 103:2 75 5:12 75th 73:3 74:2 77018 2:5 78701 1:22 78731 2:10 78749 137:4 78759 6:8	8 8 3:14,21 4:3,5 22:13,14 23:17 23:21 26:21 30:25 42:1 46:10,15 50:24 51:11 99:18 100:23 112:9 112:10 115:24 82 5:14 83 5:16 8307 6:7 11:7 85 5:18 8th 13:18 14:19 38:21 42:21,24 43:2,3,8,14 44:1,7,10 45:3 47:18 66:7 100:7	9 9 3:15 4:5 23:16 23:18,19 24:3 112:10,10 116:1 121:5 900 48:5 917-6115 2:13 95 5:20
6 6 3:24 17:4,6,13 27:7 28:14 55:13 64:18 71:11 72:3,9 72:24 75:25 96:4 101:25 121:25			
6/17/21 3:14 6/18/21 5:11 6/23/21 4:10 60 38:18 62 5:5 62,000 102:14 64 5:7 6549 137:4 6th 121:4			
7 7 4:1 15:23 20:4 20:6 112:21 7.03 94:10 7/13/22 5:23 7/15/21 5:19 70 5:8 71 5:10			

